FOI 26-72 - Document 1

Australian Government
Department of Finance

Released under the Freedom of Information Act 1982 (Cth)

Gateway Review Report (Mid-Stage) Review

For: National Firearms Register Program

To: Jeremy Johnson

This report is the property of the Australian Criminal Intelligence Commission and may only be distributed or reproduced with the permission of the Senior Responsible Official with the exception of projects or programs that include an ICT component, where the report will be shared with the Digital Transformation Agency (DTA).

Entity name:	Australian Criminal Intelligence Commission	
Program/Project name:	National Firearms Register Program	
Review type:	Mid-Stage Review	
Senior Responsible Official (SRO):	Jeremy Johnson	
Planning Meeting date:	Monday, 5 May 2025	
Onsite Review dates:	Monday, 26 May to Friday, 30 May 2025	
Date report provided to SRO:		
Date report provided to Assurance Reviews Unit:		
Review Team Leader:	**Name** s 22(1)(a)(ii)	**Signature** s 22(1)(a)(ii)
Review Team Member:	**Name** s 22(1)(a)(ii)	
Review Team Member:	**Name** s 22(1)(a)(ii)	
Review Team Member:	**Name** s 22(1)(a)(ii)	
Template version control:	Draft November 2021	

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.

Enquiries regarding the Gateway methodology should be directed to:

Assurance Reviews Unit
Department of Finance
One Canberra Avenue
FORREST ACT 2603
Email: assurancereviews@finance.gov.au

Released under the Freedom of Information Act 1982 (Cth)

Version 223/20 T

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 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

The Program has achieved some key foundational milestones, including finalisation of FFAs and endorsement of the National Data Standard. However, several critical elements remain underdeveloped or significantly delayed.

Governance structures are not yet functioning as intended, integrated planning is immature, and many core delivery streams are progressing slower than expected. While the Program remains within a feasible delivery window, there is now emerging pressure on schedule and capability, and the uneven pace of jurisdictional mobilisation poses a real risk to national cohesion. With three years remaining, successful delivery remains feasible, but only with timely and sustained management focus, enhanced coordination, and additional resourcing across multiple streams.

Summary of Key Focus Area Ratings

Key Focus Area	Rating
Business Case and Benefits	Amber
Stakeholders and End Users	Green
Governance and Planning	Red
Risk Management	Amber
Review of Current Phase	Amber
Readiness for Next Stage	Amber

Summary of Findings

The review team finds that:

Federation Funding Agreements with each of the states and territories have now been signed. These agreements established milestones to be met for funds to be drawn down. Fourteen of the 41 established milestones where the due date had passed at the time of this review had not been met. This has resulted in the need for the Commonwealth to move some $14 million of administered funds

Released under the Freedom of Information Act 1982 (Cth)

from the 2024/25 year into 2025/26. The review was advised that this movement of funds should be straight forward, and central agencies have been consulted.

The review has been advised that aside from progress against the FFA milestones, which will be reported to key governance forums soon, no other financial reporting has been completed by the Program to the governance structure. This makes it very difficult to properly assess the Program's financial performance.

Considerable work has been completed on benefits management since the last review. This builds on the earlier strategic view of benefits expected from the Program that includes two primary and three intermediate benefits that have been mapped back to Program objectives, outputs and outcomes.

This work is a good start but falls short of identifying concrete measures of aspects of police and public safety that will be benchmarked and tracked over time with reliable data to demonstrate the extent of benefit realised from the NFR for frontline police and community stakeholders. It is important for the Program to establish, benchmark and track such measures.

s 47E(d) [redacted]

Successful implementation of the NFR requires communication and engagement across a complex and extensive array of stakeholders. Generally, this has been well managed and favourably received by the impacted stakeholders notwithstanding areas of potential improvement.

As the Program's cadence increases and more states and territories start to engage within their jurisdictions there will be a further premium on maintaining a well-co-ordinated and orchestrated approach to stakeholder engagement including user centred design.

All jurisdictions commented favourably on the support and engagement provided to them by the Program's Stakeholder Engagement Stream. This includes the provision of various materials to support the jurisdictions in their local engagements.

The Program has struggled to implement appropriate governance including not effectively actioning a range of recommendations from the last review. This means that Program level governance is immature for this stage of the Program.

The Governance Framework that has been developed for the Program provides a solid foundation. However, multiple review participants have advised that governance has not been implemented as designed particularly the operation of the Steering Committee and Partner Implementation Board. Many participants observed that the Program often appears to be operating as a collection of projects rather than as a program.

The Program has struggled to implement the findings on governance since the last review. A range of factors appear to have contributed to governance challenges facing the Program including forum capacity and frequency (time for consideration), clear expectations from Program leadership about reporting and decision making, delay in agreements and therefore commencement of reporting by States and Territories, insufficient resourcing in the Program Mangement Stream and the split Program accountabilities between ACIC and AGD.

Overall Program governance is very immature for this stage and poses a risk to successful delivery of the Program.

The jurisdiction and agency governance bodies are playing an important role in the governance of the projects, and this should be recognised in the governance structure.

The current division SRO roles between ACIC and AGD is causing some confusion, particularly regarding accountability. Particularly the ISC is chaired by AGD not ACIC as lead agency and the secretariat function is split contributing to a disjointed approach to governance.

Released under the Freedom of Information Act 1982 (Cth)

The Program does not currently have an independent assurer.

The Commonwealth agencies funded to deliver the NFR are all actively engaged with the Program.

The Department of Defence also has a key role to play in the NFR through its role in managing the export of firearms. s 33(a)(ii), s 37(2)(b), s 37(2)(c), s 47E(d) [redacted]

The NFR Program has a sound Risk Management Plan and Master Program Risk and Issues Register, which remains in draft status.

Evidence presented to the review team indicates that risks are being identified in various meetings and workshops; however, these are not being captured or recorded in the risk or issues register for management, which necessitates their repeated raising in subsequent forums.

The Program progressed some key foundational items during the last phase including:

- All Financial Funding Agreements (FFAs) have been finalised
- National Data Standard endorsed
- Significant work on technical uplift
- Demonstrates early traction and stakeholder commitment.

These were later than expected putting pressure on overall timeframes. Several key Program processes and products are immature for this stage of development.

The Program's ability to deliver in the next phase is dependent on having the right people, tools, and authority in place to sustain progress. There is evidence of underpowered delivery capacity at the Commonwealth level and reliance on a small number of key individuals across policy, engagement, and technical domains. ACIC capability is insufficient to support a Program of this size. AGD capability in policy and stakeholder management consists of part-time resources under significant pressure and under the levels costed in the proposal approved by government.

Under resourcing creates fragility and expose the Program to avoidable disruption if key personnel become unavailable and functions are under resourced.

The Program is entering a pivotal stage. Attention must shift from agreement to coordinated execution. The next phase will highlight the limits of current planning, governance, and resourcing arrangements. Unless these are addressed urgently, the Program may struggle to support the practical delivery of changes across jurisdictions and delivery partners.

Released under the Freedom of Information Act 1982 (Cth)

Summary of Recommendations

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

A summary of the previous review recommendations and actions taken can be found at Appendix B

Item	Recommendation	Urgency
1	Brief the Minister on Program progress including any emerging schedule pressures associated with the FFA movement of funds	Essential (Do by September 2025)
2	Identify, benchmark and track measures of the benefits expected to be realised across all stakeholder groups (frontline police, community groups, dealers, gun owners and others)	Essential (Do by December 2025)
3	Co-ordinate engagement with jurisdictions by AGD and ACIC to maximise the efficiency and effectiveness	Essential (Do by September 2025)
4	s 33(a)(ii), s 37(2)(b), s 37(2)(c)	Critical (Do Now)
5	Strengthen Program Governance by refocusing ISC and PIPB on whole-of-program oversight including • Implementing governance as designed • Clarify and implement escalation processes • Recognise the role the jurisdictional governance plays in project delivery	Critical (Do Now)
6	Strengthen Program Level Reporting by: • Increase the frequency of PIPB meeting to monthly • Finalising a consumable integrated master schedule • Ensure Program monthly status reports include whole-of-program financial reporting and a Program RAG status • Provide all partner agency snapshots (including ACIC projects) to governance committees to underpin Program level reporting • Add dependency reporting to the snapshot	Critical (Do Now)
7	Align the chairing of the ISC to the lead agency ACIC and consolidate the secretariat functions	Recommended (Do by September 2025)
8	Resource the PMO to properly support the ISC and PIPB	Essential (Do by September 2025)

Released under the Freedom of ation Act 1982 (Cth)

9	Undertake assurance activity tied to key delivery transitions — such as data conformance, legislative readiness, or system integration	Essential (Commence by December 2025)
10	Identify and compile Program level risks, issues and dependencies from existing material into a Program level RAID log	Essential (Do by September 2025)
11	Conduct a workshop with all delivery partners to confirm the RAID log content and treatments	Essential (Do by September 2025)
12	Introduce a structured readiness self-assessment process for jurisdictions and Commonwealth partners	Essential (Do by December 2025)
13	Recruit additional resources in the PMO to manage a Program of this complexity and resource the legislative and stakeholder engagement streams to appropriate level	Critical (Do Now)
14	Identify high-risk delivery roles across policy, technical, and stakeholder streams, and implement succession planning, cross-skilling, and targeted resourcing to mitigate disruption and loss of institutional knowledge	Critical (Do Now)
15	Conduct a Mid Stage Review	By March 2026

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.

Released under the Freedom of Information Act 1982 (Cth)

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

Released under the Freedom of Information Act 1982 (Cth)

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 Second Stage Review covering the Key Focus Areas of:

- Business Case and Benefits,
- Stakeholders and End Users
- Governance and Planning
- Risk Management
- Review of Current Phase (till the week of the Review)
- Readiness for Next Stage (till 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 Official 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) [redacted] and s 22(1)(a)(ii) [redacted] for their excellent administrative support.

Released under the Freedom of Information Act 1982 (Cth)

Detailed Findings and Recommendations

Business Case and Benefits

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

Findings:

Business case

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 comprising:

- $101.7 million over three years from 2024/25 to support states and territories to uplift their systems that are integral to the NFR capability
- $30.2m over four years from 2024/25 for AGD, AFP and ABF to upgrade their systems
- $29.4m over four years from 2024/25 for ACIC to build and operate the NFR

Federation Funding Agreements with each of the states and territories have now been signed. These agreements established milestones to be met for funds to be drawn down. Fourteen of the 41 established milestones where the due date had passed at the time of this review had not been met. This has resulted in the need for the Commonwealth to move some $14 million of administered funds from the 2024/25 year into 2025/26. The review was advised that this movement of funds should be straight forward, and central agencies have been consulted.

The review has been advised that aside from progress against the FFA milestones, which will be reported to key governance forums soon, no other financial reporting has been completed by the Program to the governance structure. This makes it very difficult to properly assess the Program's financial performance.

While the FFA movement of funds does not indicate necessarily that achievement of the Program's scheduled finish date of June 2028 is in jeopardy, when combined with other information provided by interviewees about delayed progress in some jurisdictions there is evidently some emerging pressure on the schedule. It would be prudent for the Program in the context of the FFA movement of funds to brief their Minister on the Program's progress, including any emerging schedule pressures.

Benefits

Considerable work has been completed on benefits management since the last review. This builds on the earlier strategic view of benefits expected from the Program that includes two primary and three intermediate benefits that have been mapped back to Program objectives, outputs and outcomes.

Fifteen benefit measures have been identified to track delivery of the Program. Those fifteen measures map directly to the three intermediate benefits. The measures relate to steps that the Program needs to take to implement the NFR, for example s 37(2)(b), s 37(2)(c) or new legislation or s 37(2)(b), s 37(2)(c). It is proposed that progress towards meeting these steps is reported iteratively.

Released by the Freedom of Information Act 1982 (Cth)

None of the measures identified directly measure the two primary expected benefits from the Program of improved police safety and improved public safety. Instead, a series of case studies have been developed, with the jurisdictions, as a means of demonstrating how police and public safety may be improved because of the NFR.

This work is a good start but falls short of identifying concrete measures of aspects of police and public safety that will be benchmarked and tracked over time with reliable data to demonstrate the extent of benefit realised from the NFR for frontline police and community stakeholders. It is important for the Program to establish, benchmark and track such measures.

s 47E(d) [redacted] Identifying and benchmarking benefit measures for these stakeholders (and indeed for all stakeholder groups) is also important, both for helping to manage stakeholder buy-in and to enable a benefits-led approach to scope pressures as they arise.

The DTA has recently launched a Benefits Management Policy, associated training and have support available for Programs to align their benefits management approach to the policy. The Program would benefit from seeking this support.

Recommendations

1. Brief the Minister on Program progress including any emerging schedule pressures associated with the FFA movement of funds.
2. Identify, benchmark and track measures of the benefits expected to be realised across all stakeholder groups (frontline police, community groups, dealers, gun owners and others).

Released under the Freedom of Information Act 19 (Cth)

Stakeholders and End Users

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 is being delivered by multiple commonwealth agencies and all jurisdictions.

Successful implementation of the NFR requires communication and engagement across a complex and extensive array of stakeholders. Generally, this has been well managed and favourably received by the impacted stakeholders notwithstanding areas of potential improvement.

As the Program's cadence increases and more states and territories start to engage within their jurisdictions there will be a further premium on maintaining a well-co-ordinated and orchestrated approach to stakeholder engagement including user centred design.

Commonwealth agencies

The Commonwealth agencies funded to deliver the NFR are all actively engaged with the Program and participating as appropriate in forums established to help implement and govern the NFR. These agencies are ACIC, AGD, ABF and AFP. They have all shown strong commitment to the success of the Program.

The Department of Defence, although not funded under the Program, also has a key role to play in the NFR through its role in managing the export of firearms. s 33(a)(ii), s 37(2)(b), s 37(2)(c) [redacted]

Jurisdictions

All jurisdictions commented favourably on the support and engagement provided to them by the Program's Stakeholder Engagement Stream. This includes the provision of various materials to support the jurisdictions in their local engagements with stakeholders and the public, such as presentations, FAQs and branded messaging.

Many of the jurisdictions raised some concern about how the Program engaged with them on technical aspects of the Program, in the sense that they often felt that they were being told about what the technical solutions were going to be rather than being engaged in genuine co-design about what the solutions could be.

Jurisdictions also expressed a concern about risks being raised with the Program that are not being tracked or followed through to resolution.

The jurisdictions noted that a more co-ordinated approach to visits from the various Program streams will be important in the coming phase of the Program to ensure the most efficient and effective use of time and resources.

Recommendation

Co-ordinate visits by the Program streams to jurisdictions to maximise the efficiency and effectiveness of those visits.

Released under the Freedom of Information Act 1982 (Cth)

[redacted]

Recommendation

3. Co-ordinate engagement with jurisdictions by AGD and ACIC to maximise the efficiency and effectiveness.
4. s 33(a)(ii), s 37(2)(b), s 37(2)(c) [redacted]

Released under the Freedom of Inform on A h)

Governance and Planning

Assessment Rating:	**Red**: There are significant issues in this Key Focus Area that may jeopardise the successful delivery of the program.

Findings:

The Program has struggled to implement appropriate governance including not effectively actioning a range of recommendations from the last review. This means that Program level governance is immature for this stage of the Program.

The Governance Framework that has been developed for the Program provides a solid foundation. However, multiple review participants have advised that governance has not been implemented as designed particularly the operation of the Steering Committee and Partner Implementation Board. Many stakeholders observed that the Program often appears to be operating as a collection of projects rather than as a Program.

The governance structures developed for the Program outline key roles and forums, but implementation has been inconsistent and not always fit-for-purpose for scaled delivery. Multiple review participants noted that the Steering Committee and Partner Implementation Board (PIB) are not functioning as effective oversight or integration mechanisms. Instead of operating as a unified Program, many stakeholders observed that activity tends to resemble a collection of largely independent projects, with limited escalation pathways or shared accountability for cross-cutting risks.

Also, the jurisdiction and agency governance bodies are playing an important role in the governance of the projects. The governance arrangements described in interviews and supporting documentation by some jurisdictions seemed at face value to be very robust. This should be recognised in the Program governance structure as an important underlying contributor to confidence in the Program's progress.

A range of factors appear to have contributed to governance challenges facing the Program including forum capacity and frequency (time for consideration), clear expectations from Program leadership about reporting and decision making, delay in agreements and therefore commencement of reporting by States and Territories, insufficient resourcing in the Program Mangement Stream and the split Program accountabilities between ACIC and AGD.

The governance documentation establishes a structure and details the roles and responsibilities of the forums, boards, and committees that constitute the framework. Although the forums, boards, and advisory groups appear to function effectively on their own, greater clarity is required regarding their interactions and the specific roles and responsibilities of each.

Review participants have uncertainty how the escalation process is implemented and how this is formally coordinated between the levels. This should be clarified, and clear guidance ought to be provided to members regarding their individual roles, as well as the overall functions of the various boards or groups and this should be consistently applied.

The NFR Partner Implementation Program Board (PIPB) has commenced meeting since the last review, and the directions outlined in the terms of reference provide a solid foundation for the board. However, the review team noted that some functions supporting the PIPB are not mature, particularly regarding the ability to monitor the Program's risks, schedule, budget, dependencies, and scope.

The board plays a critical role in ensuring that the Program and all dependent projects remain on track. It must ensure that key risks and issues are discussed and that decisions

Released under the Freedom of Information Act 1982 (Cth)

are made or escalated to the appropriate levels. The current timing of quarterly meetings has caused delays in the Program's ability to have papers reviewed, approved, and delivered to partners within the required time frames. The interval between convening this board was raised in the previous review, and the requirement for this board to meet monthly remains in effect.

The initial Project Plans submitted by partners as part of the FFA processes and the monthly reports being provided to the ACIC are a great source for extracting both the project schedule and gaining insights into the risks identified by the partners. This data can then be added to a section of the program risk register and reported back to the partners at the project board meetings to ensure they remain up to date.

The performance of the NFR Implementation Steering Committee (NFR ISC) has been discussed in several forums throughout the review process, and the many review participants said that the committee is not fulfilling its intended purpose as outlined in the terms of reference.

The terms of reference clearly state that the steering committee is meant to provide senior oversight to support the strategic direction, long-term objectives, and key deliverables of the Program. It plays a vital role in approving, resolving, or escalating issues and documents presented. Many committee members have indicated that it has struggled to establish effective processes to fulfil these roles.

Particularly, this forum is being used for communication rather than governing implementation and critical decision making delivering effective controls or management of the Program.

Several members suggested that the meeting administration processes described in the terms of reference are not being adhered to, and the use of pre-reading materials for discussion items and approval processes requires attention.

The timely delivery of documents and pre-reading papers, including Program reports, must be guaranteed to enable committee members to prepare adequately for these meetings. This will streamline the reviews and decision-making processes, allowing for clear direction to be provided up or down the framework where necessary.

A key aspect of both the ISC and PIPB should be the presentation of the project status report. Snapshots of all partners' projects submitted to the ACIC ought to be tabled and key issues, dependencies and risks highlighted in the program dashboard for discussion and resolution by the board.

The current division SRO roles between ACIC and AGD is causing some confusion, particularly regarding accountability. Particularly the ISC is chaired by AGD not ACIC as lead agency and the secretariat function is split contributing to a disjointed approach to governance.

The Program does not currently have an independent assurer. The review team was advised that a new independent assurer is currently being procured at a portfolio level and that it was intended to use the new assurer when appointed to help oversee the Program. The review supports this approach.

Recommendations

5. Strengthen Program Governance by refocusing ISC and PIPB on whole-of-program oversight including

- Implementing governance as designed

Released under the Freedom of Information Act 1982 (Cth)

- Clarify and implement escalation processes
- Recognise the role the jurisdictional governance plays in project delivery

6. Strengthen Program Level Reporting by:

- Increase the frequency of PIPB meeting to monthly
- Finalising a consumable integrated master schedule
- Ensure Program monthly status reports include whole-of-program financial reporting and a Program RAG status
- Provide all partner agency snapshots (including ACIC projects) to governance committees to underpin Program level reporting
- Add dependency reporting to the snapshot

7. Align the chairing of the ISC to the lead agency ACIC and consolidate the secretariat functions.
8. Resource the PMO to properly support the ISC and PIPB
9. Undertake assurance activity tied to key delivery transitions — such as data conformance, legislative readiness, or system integration.

Released under the Freedom of Information Act 1982 (Cth)

Risk Management

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

Findings:

The NFR Program has a sound Risk Management Plan and Master Program Risk and Issues Register, which remains in draft status.

The review team also accessed the NFR Master Program Risk Register, which lists 43 risks: 31 in progress, 9 open, and 3 closed. These two documents appear well positioned to support effective risk management processes across the Program. However, they may not accurately reflect the true number of risks associated with this level of the Program, given its significant complexities and the concerns raised by some during the review processes.

Evidence presented to the review team indicates that risks are being identified in various meetings and workshops; however, these are not being captured or recorded in the risk or issues register for management, which necessitates their repeated raising in subsequent forums.

It was challenging to determine how these risks or issues are managed through the governance structure and whether they are addressed consistently and effectively across different levels. The risk register and issues database dashboard only report the number of closed and open risks, and it would be more useful to indicate the number of risks in each rating to provide management with a quick snapshot of this data.

A previous recommendation was to create a single Program-wide risk register; however, initially, the review team was informed that the external partners were not supportive of this suggestion. During the review period, opportunities arose that demonstrated risks could be identified from the partners' Programs through the monthly reports and their initial project plans.

A review of these artifacts and the extraction of these risks could have been conducted and uploaded to the risk register, then presented back to the partners through the governance process. This could also apply to dependencies, high-level scheduling, and governance structures that may be included in their project plans. It was unclear who in the ACIC had reviewed these documents.

s 47E(d) [redacted] This is being managed through the communications and stakeholder engagement processes but requires monitoring throughout the lifecycle of the Program and should be included in the risk register.

The Risk Management plan identifies the risk owner for the Program; however, it does not specify an individual risk manager or someone accountable for implementing the processes within the Risk Plan and ensuring that risk management is actively undertaken across all streams and areas, both internal and external, to the Program. The Risk Plan also indicates that risk review meetings will be scheduled monthly for Program and Project Stream risks or prior to board and committee meetings, but no evidence of those occurrences was found by the review team.

The current stage of the Program presents an opportunity to conduct an internal Program risk workshop to formalise the internal risks and distil the partner risks from various documents, including project plans, snapshot reports, and advisory workshops. Once this is

Released under the Freedom of Information Act 1982 (Cth)

completed, a workshop with external partners will confirm the risks, provide a comprehensive view of the Program, and establish a process for periodic reviews throughout the Program's life cycle.

Recommendations

10. Identify and compile Program level risks, issues and dependencies from existing material into a Program level RAID log
11. Conduct a workshop with all delivery partners to confirm the RAID log content and treatments

Released under the Freedom of Information Act 1982 (Cth)

Review of Current Phase

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

Findings:

The Program progressed some key foundational items during the last phase, but later than expected putting pressure on overall timeframes. Several key Program processes and product are immature for this stage of development.

- **Foundational Progress Achieved but later than expected**
    - All Financial Funding Agreements (FFAs) have been finalised.
    - National Data Standard endorsed.
    - Significant work on technical uplift
    - Demonstrates early traction and stakeholder commitment.

The NFR Program has made encouraging progress in establishing core foundations. The endorsement of the National Data Standard and execution of Federation Funding Agreements (FFAs) across all jurisdictions represent essential achievements that reflect a strong, shared national commitment to reform. These foundational steps lay the groundwork for more structured delivery and coordinated engagement as the Program moves into a more intensive design and implementation phase. s 37(2)(b), s 37(2)(c) [redacted] there is now a clearer platform from which to strengthen delivery planning, Program cohesion, and shared accountability.

s 47B(a) [redacted]

The National Data standards were finalised later than expected and are key to Program progress.

- **Integrated Master Schedule:**
    - Roadmaps exist, but a consolidated, fit-for-purpose integrated master schedule across ACIC and jurisdictions was not sighted.
    - Lack of visibility on dependencies, critical path activities, and delivery sequencing.

The finalisation of FFAs and agreement on national reference standards represent substantial enablers for the next phase. These milestones demonstrate a maturing Program with increasing jurisdictional commitment. However, mobilisation remains uneven, and the absence of a consolidated national delivery baseline, including an integrated master schedule, limits visibility of progress and sequencing. As the Program transitions from planning to execution, a unified baseline would support shared accountability and enable better coordination of interdependent activities across jurisdictions.

Released under the Freedom of Information Act 1982 (Cth)

- **Program Risk Management and Escalation Pathways:**
    - Issues are not consistently escalated or resolved through governance forums.
    - Risk registers exist but are not being fully used to manage emerging issues.

While risk registers have been established at both Commonwealth and jurisdictional levels, their use in actively managing emerging issues appears inconsistent. Several interviewees noted that risks are being captured but not routinely escalated, tracked, or resolved through existing governance pathways. In particular, cross-stream or cross-agency risks — such as legislative dependencies or misaligned delivery assumptions — often remain siloed. This reduces the Program's ability to anticipate compounding delivery pressures or respond quickly to early warning signs. As implementation accelerates, there is a growing need for a more disciplined and transparent approach to risk escalation and resolution at the Program level, ensuring that issues with national implications are addressed collaboratively and early.

- **Dependencies and Risks:**
    - Technical Uplift plans developed
    - Technical streams are active but not fully aligned s 37(2)(b), s 37(2)(c) [redacted]
    - Legislative changes (e.g., data sharing rights) are not clearly sequenced or managed programmatically.

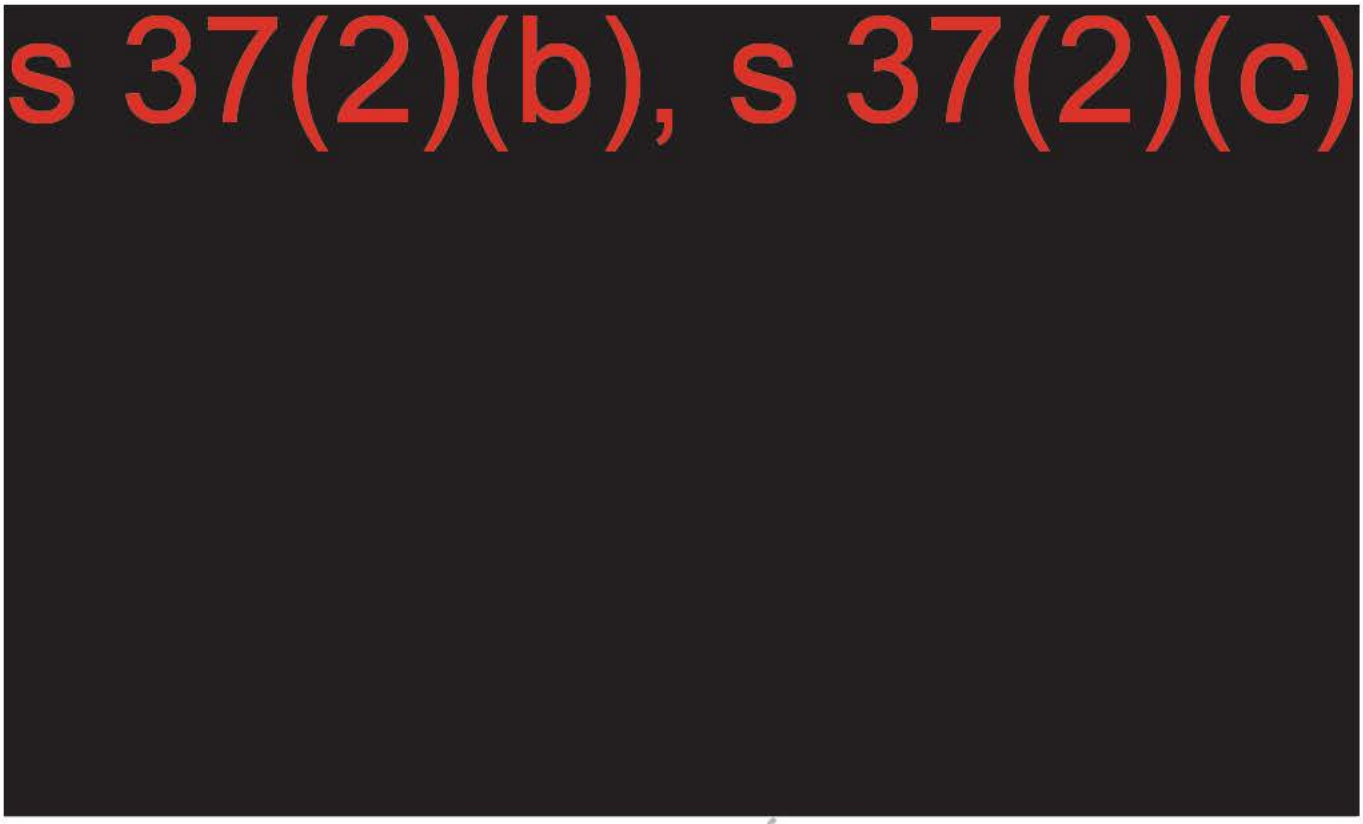
The Program has made notable progress in developing technical uplift plans across several streams, with technical design and early integration planning well underway in multiple jurisdictions. However, these efforts are not yet fully aligned. s 37(2)(b), s 37(2)(c) [redacted]

- **Change and Adoption**

Initial change management artefacts have been produced, including early drafts of a national adoption framework, communications plans, and training needs analysis. These documents offer a good structure for change planning.

Some jurisdictions have made progress in establishing local implementation teams and in engaging enforcement and registry staff, s 47B(a), s 47B(b) [redacted] Stakeholder-facing materials and communications artefacts remain in development, and there is no agreed process for monitoring change readiness across the system. As a result, the Program has yet to demonstrate that it has a clear and scalable model for supporting behavioural change and operational adoption — two key enablers of sustained benefit realisation.

Released under Freedom of Information Act 1982 (Cth)



- **Procurement Activity is Progressing:**
    - Several jurisdictions have commenced procurement processes to support registry upgrades and system integration.
    - ACIC has engaged delivery support services s 37(2)(c), s 47E(d) to assist with Program assurance and uplift.
    - FFAs incorporate procurement milestones, reflecting jurisdictional planning and investment intent.
    - While procurement is progressing, there is an opportunity to enhance central visibility and alignment to ensure national capability outcomes are supported.

Procurement activity has commenced across the Commonwealth and in several jurisdictions, with engagements underway to support technical delivery and Program enablement. FFAs provide a foundation for jurisdictional procurement planning. However, there is limited national coordination around vendor alignment, timing, and conformance with shared technical expectations. Enhancing visibility and collaboration on procurement activity would support interoperability, reduce duplication, and contribute to more coherent sequencing across the Program.

- **Machinery of Government (MoG)**
    - ACIC and NFR policy responsibilities are transitioning to the Department of Home Affairs.
    - Creates short-term ambiguity but may unlock longer-term capability uplift and integration.

Released under the Freedom of Inf

The recent Machinery of Government (MoG) changes — which will see ACIC and key NFR policy functions transition to the Department of Home Affairs — represent a structural shift that introduces both uncertainty and opportunity. In the short term, the transition has created ambiguity around governance responsibilities, reporting lines, and coordination between policy and delivery teams. s 47B(a), s 47B(b), s 47E(d)

[redacted]

However, the consolidation of law enforcement, border control, and national security functions under Home Affairs may offer long-term advantages to the Program. It presents an opportunity to streamline governance, centralise support functions, and unlock greater delivery capacity and cross-agency integration — s 33(a)(i), s 33(a)(ii), s 37(2)(b), s 37(2)(c) [redacted] Realising these benefits will depend on active change management and early clarification of roles, but the transition offers a chance to enhance strategic alignment and delivery leverage at the Commonwealth level.

Recommendations

See Readiness for Next stage

Released under the Freedom of Information Act 1982 (Cth)

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 Program is entering a pivotal stage. Some foundational elements now largely in place — including endorsed national standards and funding agreements — attention must shift from agreement to coordinated execution. While progress has been meaningful, the next phase will highlight the limits of current planning, governance, and resourcing arrangements. Unless these are addressed urgently, the Program may struggle to support the practical delivery of changes across jurisdictions and delivery partners.

National Delivery Planning and Visibility

The High-level roadmap is a good start, but the Program still needs consumable integrated master schedule remains one of the most significant barriers to national readiness. While jurisdictions have developed their own roadmaps, these vary in quality and structure. There is no single artefact that consolidates milestones, maps interdependencies, or enables Program-level sequencing.

At this stage, a minimum viable and 'consumable' integrated schedule — at a high level — would provide the shared visibility needed to align activities, anticipate bottlenecks, and support performance assurance. Without it, the Program will continue to operate in parallel streams, unable to manage slippage, handovers, or integration across components. This issue was noted in the previous Gateway Review and remains unresolved.

Governance Realignment and MoG Transition

Existing governance structures are immature and not yet configured for scaled delivery. There remains ambiguity about decision rights, escalation pathways, and who holds final authority on design, technical, or partner readiness matters.

The transition of ACIC and NFR and firearms-related responsibilities from the Attorney-General's Department to the Department of Home Affairs introduces both risk and opportunity. Done well, the transition can strengthen Program delivery, policy alignment, and s 33(a)(i), s 33(a)(ii), s 37(2)(b), s 37(2)(c) . But without timely clarification of roles, resourcing, and decision-making settings during the handover period, execution risks may grow at a critical juncture.

Delivery Capability, Capacity and Continuity

The Program's ability to deliver in the next phase is dependent on having the right people, tools, and authority in place to sustain progress. There is evidence of underpowered delivery capacity at the Commonwealth level and reliance on a small number of key individuals across policy, engagement, and technical domains. ACIC capability is insufficient to support a Program of this size. AGD capability in policy and stakeholder management consists of a part-time resource under significant pressure and under the levels costed in the proposal approved by government.

Under resourcing creates fragility and exposes the Program to avoidable disruption if key personnel become unavailable and functions are under resourced.

Released under the Freedom of Information Act 1982 (Cth)

ACIC has advised had additional resourcing is currently being sought. AGD needs to resource at an appropriate level.

Program management functions require uplift — particularly in tracking progress, integrating risks across streams, and sequencing delivery activities. Current arrangements may be sufficient for design, but not for scaled implementation involving multiple concurrent transitions.

Assurance Activity and Delivery Risk

There is currently no structured assurance process to test readiness, surface emerging delivery risk, or inform timely decision-making. Interview feedback and documents suggest that assurance is conducted inconsistently and often focuses on narrow vendor or contract performance rather than whole-of-program risk. Stakeholders, including the SRO, noted that assurance does not yet provide early warnings or confidence in major transitions.

A more risk-informed approach to assurance — targeted at key transition points — would better support the Program's complex delivery environment and give stakeholders greater visibility and confidence.

Readiness Assessment

s 47B(a), s 47B(b), s 47E(d) [redacted]

Stakeholder Confidence and Interagency Alignment

Stakeholder trust is improving but remains uneven. ABF engagement has strengthened, but s 33(a)(ii), s 37(2)(b), s 37(2)(c). s 47B(a), s 47B(b), s 47E(d) [redacted]

Building stakeholder readiness will require more than updates — it will need deliberate, two-way planning conversations, shared problem-solving, and consistent follow-up.

Conclusion

The NFR Program has achieved important foundational steps and improved coordination with partner agencies. However, progress across the core delivery streams remains slower than expected, and several key enablers raised in the previous Gateway Review are yet to be fully developed. Delivery maturity remains uneven, and the Program has not yet achieved the coherence or integration required to support national implementation.

The recent Machinery of Government (MoG) changes add further complexity, introducing short-term uncertainty around governance and delivery responsibilities. While this presents a risk of further delay, it also creates a timely opportunity to clarify accountabilities and reposition it within a broader national security and enforcement context.

Released under the ... om o ... mation Act 1982 (Cth)

Recommendations

12. Introduce a structured readiness self-assessment process for jurisdictions and Commonwealth partners.
13. Recruit additional resources in the PMO to manage a Program of this complexity and resource the legislative and stakeholder engagement streams to appropriate levels
14. Identify high-risk delivery roles across policy, technical, and stakeholder streams, and implement succession planning, cross-skilling, and targeted resourcing to mitigate disruption and loss of institutional knowledge.

Released under the Freedom of Information Act 1982 (Cth)

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	Amber
March 2026	Mid-Stage Review	

Released under the Freedom of Information Act 1982 (Cth)

Appendix B: Previous Recommendations

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.

Released under the Freedom of Information Act 1982 (Cth)

Previous Recommendations and Actions Taken

ACIC Note: This table draws from a more detailed action plan against each of these recommendations, and should not be read in isolation.

Item #	Recommendation	Category	Action Taken	Review Team Comments
1	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	**COMPLETE** • ABF are participating in all program workshops, PIPB and the PMF. s 33(a)(ii), s 37(2)(b), s 37(2)(c) • ACIC and ABF engagement to date has included multiple engagements to identify the NFR impact on their business and technical operations. • An onsite engagement with the ABF's firearms import operations team is in planning for ~July. s 33(a)(ii), s 37(2)(b), s 37(2)(c)	s 33(a)(ii), s 37(2)(b), s 37(2)(c)

Released under the Freedom of Information Act 1982 (Cth)

2	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.	Essential - due by May 2025	**COMPLETE, BUT IS AN ONGOING NEED** • ACIC has already adopted a user-centred design approach as part of its DTA design assurance activities. Status column relates to the work required to determine/capture partner assurance arrangements. • ACIC is actively working with partners to map out end-to-end process flows to identify user interaction, business processes, information flows and system requirements. • ACIC's Service Design Senior Adviser is working with the NFR Program to ensure the NFR's approach to UX and service design is informed by best practice UX and SD principles and is in line with ACIC's customer-centric service design approach. This capability can also knowledge share with partners. • A UX responsibilities matrix is under development, which will clearly identify the role of each stream and each agency or body within the UX approach. • User personas are well progressed, which will assist in better targeting UX and stakeholder engagement. • An operational system interface user engagement schedule is under development by ACIC, s 37(2)(b), s 37(2)(c) [redacted] • The user engagement schedule will complement and inform other external engagement undertaken though the NFR's stakeholder engagement stream. • ACIC is establishing a quarterly UX Forum with the first meeting to be held in May. • The monthly PMF forum also offers an opportunity to consider UX/UI-related activities to align end-user engagement with police partner agencies. • s 47E(d) [redacted] • The National Stakeholder Engagement and Communications Strategy (the Stakeholder Strategy) is informed by the principle of user-centred design.	Ongoing.

Released under the Freedom of Information Act 1982 (Cth)

Previous Recommendations and Actions Taken				
			• Partners are working with ACIC to map out end-to-end process flows to identify user interaction, business processes, information flows and system requirements. • Partners are participating in early UX discussions with the PMO and will participate in the quarterly UX forum. • Partners working with the NFR PMO in developing a user engagement schedule for operational users of system interfaces. • s 47B(a), s 47B(b), s 47E(d) • *While this is marked as complete, it's important to note that work of this nature will be ongoing for the foreseeable future.*	

Released under the Freedom of Information Act 1982 (Cth)

Previous Recommendations and Actions Taken

3	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.	Essential – do by May 2025	**ONGOING NOTING NECESSARY HANDLING APPROACH** • NFR PMO has engaged with NCIS to understand lessons learned relating to compliance. • Work on risks and controls has been developed in collaboration with partner agencies. • A final compliance framework will be informed by partner approaches to compliance, and relies on progress relating to technical builds, change practice, and in some instances, amendments to legislation and policy. However, it will be unified through a co-designed set of common guiding principles and shared risks. • To achieve this, the NFR PMO is developing an NFR Compliance Framework Plan, which will enable a co-design approach with partners, including for the shared elements detailed above, and set out a schedule for completion. This will be released to partners in May. • Once complete, the compliance framework will be agreed within the NFR's governance framework and will inform and unite compliance approaches by individual partners. • Compliance-related engagement with end-users will be in line the Stakeholder Strategy. AGD will work with ACIC's change an adoption stream, and program partners, to support NFR Program communications about compliance requirements.	Not complete.

Released under the Freedom of Information Act 1982 (Cth)

Previous Recommendations and Actions Taken

4	Review, streamline and fully implement Program governance arrangements. Guidance: Distinguish between governance forums and working arrangements	Essential – do by March 2025	**COMPLETE** • The Program Director reviewed the NFR's governance arrangements and presented it to PIPB for noting in February 2025. • A refreshed governance diagram has been developed. • Discussions were held at AFIN UAG in March 2025 and confirmed AFIN UAG's technical advisory role to the NFR. • PIPB has been amended from every two months to every three months, as requested by PIPB. This ensures that each PIPB meeting has a corresponding NFR ISC meeting to enable efficient escalation of matters where required.	Completed. See recommendations in this report.

Released under the Freedom of Information Act 1982 (Cth)

Previous Recommendations and Actions Taken

5	Implement formal Program reporting arrangements. Guidance: Program updates could be done now while formal reporting is appropriately designed.	Critical – do now	**COMPLETE** The NFR Program regularly reports to the NFR's governance committee structure, s 47E(d) [redacted] and to ACIC's Enterprise Program Management Office (EPMO). From April 2025, this will include quarterly stream reporting (covering Q3 2024-25, and each quarter thereafter). **NFR Governance** - NFR ISC (every 12 weeks) - Partner Implementation Program Board (PIPB) (every 12 weeks) - Portfolio Coordination Committee (PCC) (every four weeks) s 47E(d) [redacted] **ACIC EPMO** - Monthly project reporting for the tech and data quality streams (since July 2024) and for the change and adoption stream (including benefits) from February 2025. - Monthly program-level dashboard report (commenced January 2025) - Program-level risk reporting from January 2025	Completed. See recommendations in this report.

Released under the Freedom of Information Act 1982 (Cth)

Previous Recommendations and Actions Taken

6	Develop an integrated master schedule including jurisdiction and agency milestones and key dependencies. Guidance: Consider resourcing while developing a realistic schedule	Critical – do now	**COMPLETE NOTING UPDATES REQUIRED** A master schedule has been developed but was delayed owing to a number of jurisdictions and Commonwealth partners being late in their finalisation and delivery of their project plans and associated schedules. The draft schedule will be amended and finalised once these have been received. Scheduling is primarily driven by the NFR Roadmap and stream-level schedules and leverages frequent (weekly or more) interaction between stream leads to identify dependencies. These dependencies are also identified within multi-partner workshops, and between partner agencies and stream leads. **Note:** ACIC has actively supported partner agencies that have been delayed in finalizing their project plans.	Not complete. See recommendations in this report.

Released under the Freedom of Information Act 1982 (Cth)

Previous Recommendations and Actions Taken

7	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	**COMPLETE** • All stream risks have now been consolidated into a single, program-wide risk register. • Monthly risk reviews are in place. • ACIC is in regular contact with partners regarding progress/delays, which informs the monthly risk review. • s 47B(a), s 47B(b), s 47E(d) • Any lower rated risks will be managed by partners as required, and escalated as required, in line with agreed escalation triggers, the NFR risks and issues management plan (in draft) and established NFR governance frameworks.	Complete. See recommendations in this report.
8	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	**COMPLETE** • Refer to R7 • In addition to the existing NFR risk governance framework, the process for escalating risks is set out in the (draft) NFR Risk and Issue Management Plan and forms part of the PCC and PIPB ToRs.	Complete. See recommendations in this report.

Released under the Freedom of Information Act 1982 (Cth)

Previous Recommendations and Actions Taken

9	Develop a comprehensive Resource Management Plan to mitigate critical resourcing risks. Guidance: Consider delivery partners in this plan	Essential – do by March	**CLOSE TO COMPLETE** • PMO resources are identified and managed within each Stream project management plan. • Partner resources are managed within each partner project and are a matter for each individual agency to determine. Where resourcing challenges, risks or issues exist, partners report this to the PMO which informs the monthly risk review at program level and to PIPB each quarter. • ACIC has identified that the scale and complexity of the NFR Program is greater than initially resourced for, and is undertaking a resourcing reprofiling exercise, which will inform future recruitment of new FTE against a variety of roles. • Resourcing consideration also includes Firearms Capability roles within AFIN and NFID, which are central to the function of the NFR.	Not complete.
10	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	**COMPLETE** The Program Plan and associated Master Schedule have been developed but will have gaps where a number of jurisdictional project plans have yet to be delivered. As a consequence, they will be amended and finalised once these have been received. The ongoing management of these artefacts will be supported via the NFR resourcing reprofiling and associated recruitment.	Complete. See recommendations in this report.
11	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	**COMPLETE** • AGD appointed additional resourcing (1FTE) to support the Legislation and Policy Stream and has access to surge capacity to support this work at peak times.	Complete.

Released under the Freedom of Information Act 1982 (Cth)

Previous Recommendations and Actions Taken

12	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	**COMPLETE** • The CONOPS and ILM were noted by PIPB in December 2024. • The high-level CONOPS quadrants have been finalised. • ACIC working with to work with partners on the next level of detailed design information to complete the detailed design of the Firearms and Firearm Management, and Imports and Exports quadrants. • ACIC has also planned engagement with the NCIS Program in Q3 FY24/25 to scope work require for quadrants s 37(2)(b), s 37(2)(c) [redacted]	Complete.
13	Conduct a mid-stage review	Recommended May 2025	Complete.	Complete.

Released under the Freedom of Information Act 1982 (Cth)

Appendix C: Review Checklist

Consistent with *Resource Management Guide 106: Australian Government Assurance Reviews*, this section contains the review team's assessment[1] of the program against each of the Key Focus Areas. Review teams apply their collective expertise to determine the relevance and appropriateness of each question below with regard to the program and review stage.

The review team provides an assessment against each of the questions to allow a level of granularity and assist entities to identify and address the key issues. The overall delivery confidence assessment for the review is provided in the Dashboard.

The review team considers the individual Key Focus Area assessment ratings below and exercises its own judgement and expertise to determine the most suitable overall assessment of delivery confidence.

<Guidance: provide an assessment against each of the Key Focus Areas. Provide sufficient information (or a link to the main body of the report) to enable entities to identify and address any key issues>

Business Case and Benefits:

Assessment Rating: <insert Key Focus Area rating>

	Key Focus Area Question	Comments
1.1	Strategic Fit: Is the business case up to date and does it continue to demonstrate the business need and contribute to the business strategy?	Partially: The program has advised they will be applying for a movement of funds.
1.2	Options: Is the preferred way forward still appropriate?	Yes: The Program is designed for incremental change to existing commonwealth systems supporting the NFS environment.
1.3	Value for Money: Are the proposed delivery arrangements likely to achieve value for money?	N/A
1.4	Affordability: Are the costs within current budgets? Is the program/project funding affordable and supported by key stakeholders?	Partially: It is difficult to assess financial performance of the program given the absence of program financial reporting. There is some indication of some teams being underfunded for example the PMO and NFID teams.
1.5	Achievability: Is the entity still realistic about its ability to deliver the outcomes and realise benefits?	Partially. There is some indication of emerging schedule pressure that is not reflected in current program status reports.
1.6	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
1.7	Benefits: Are the outcomes delivered and the benefits to be realised understood and agreed to with benefit owners?	Partially: Further work is required to identify benefit measures.
1.8	Benefits: Is there a strategy and plan for realising benefits? Is it current?	Yes.

Released under the Freedom of Information Act 1982 (Cth)

Stakeholders and End Users:

Assessment Rating: Amber

	Key Focus Area Question	Comments
2.1	Have the stakeholders and their areas of interest been identified, and do they support the program/project?	Yes: Stakeholder support is generally strong, s 47E(d) s 47E(d)
2.2	Is this a whole of government initiative or are other agencies involved in design, development or delivery?	Yes: Multiple commonwealth agencies and all jurisdictions
2.3	Have stakeholder and end-user needs been taken into account in the design and delivery strategy?	Partially: Each State and Territory is responsible for UX design in their jurisdiction. NSW's portal has been noted by stakeholders as being user-friendly and has created efficiencies and a better experience for gun owners.
2.4	Do stakeholders continue to support the approved business case and the selection of the preferred option? (This includes the potential or recommended delivery approach and mechanisms.)	Yes: Stakeholders are generally supportive of the program
2.5	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?	Partially: The strategy is fit but execution has not always been smooth between AGD and ACIC or always felt to stakeholders like a unified approach.
2.6	Are stakeholders confident outcomes will be achieved when expected?	Partially: There are differing views. Some movement of funds is already required.
2.7	Do stakeholders feel sufficiently engaged?	Yes: They can see areas for improvement.

Released under the Freedom of Information Act 1982 (Cth)

Governance and Planning:

Assessment Rating: RED

	Key Focus Area Question	Comments
3.1	Is there an overall program governance framework in place and is it fit for purpose? Has a steering committee, or equivalent, been established to oversee the project and is it effective?	Partially: Program governance has been documented and established; however, it is not effective in the current structure and needs to be reviewed against the terms of reference and program requirements.
3.2	If other agencies are involved in design and delivery, how are they included in the governance framework?	Partially: Many agencies are involved, identified in the documentation and form part of the documented framework. However, the practical implementation of the governance processes is not serving the program well.
3.3	Are program and project controls effective?	No: Processes are implemented. The framework is not effective noting the time between meetings at the different levels creates delays and possibly encourages processes to proceed without going to the relevant boards or committees.
3.4	Is there a change management process in place covering both program and organisational change requests? Is it effective?	No: From what was visible to the review team it is not effective.
3.5	Are there adequate controls over scope change? Is there executive visibility? Have necessary approvals (including at government level) been secured?	No: The was no evidence found to show how scope is being managed.
3.6	Is there a quality high level design? Does it contain sufficient detail to allow scheduling and alignment of the work to be delivered? Has it been signed off by the appropriate governance forum?	Partially: An Investment Logic Map, Solution presentation and blueprint has been provided, but it is not at the maturity level it would have been expected for this stage of the program. A high-level design was not presented.
3.7	Is there executive level commitment to the program? Are responsibilities clear? Are key positions staffed?	Yes: There is executive level commitment to the program and in most cases the Responsibilities are understood. There is a requirement to look at the resourcing requirements for the program.

Released under the Freedom of Information Act 1982 (Cth)

Risk Management:

Assessment Rating: Amber

	Key Focus Area Question	Comments
4.1	Is there an organisational framework for managing risks, assumptions, issues and dependencies (RAID) associated with this program/project?	Partially: There is a framework in place for managing risks and a Risk and Issues Register. Assumptions, Issues and dependency management were not identified in the documents provided.
4.2	Have the major risks been identified and are risk owners appointed? Are the risks being effectively managed?	Partially: Major risks have been identified, and risk owners have been appointed; however, it is not clear that all the risks have been registered or that they are being effectively managed.
4.3	Are there specific high-level risks that might affect this program arising from, for example, multiple delivery entities, program complexity, novelty, technology, cyber issues, complex supplier arrangements or multiple stakeholders?	Yes: This is a complex program involving multiple Commonwealth, State, Territory and non-government stakeholders.
4.4	Is the RAID log regularly reviewed and updated regularly and briefed to governance committees and management as appropriate?	Partially: The Risk and Issues Plan provides a good framework for the management of risks and issues. There was little evidence that risks, issues and independences are being activity managed.
4.5	Have assurance arrangements for the program/project been put in place and is there an Assurance Plan?	No: The review team have been advised that independent assurance arrangements are being considered for the next phase, but they are not currently in place for this program.
4.6	Are there contingency plans that address risks as necessary?	No: Contingency management is not identified in the Risk and Issues Plan, and no evidence was noted by the review team.

Released under the Freedom of Information Act 1982 (Cth)

Review of Current Phase:

Assessment Rating: Amber

	Key Focus Area Question	Comments
5.1	Is there an integrated master schedule showing the program/project milestones along with the milestones and interdependencies of programs/projects (Including those managed by other agencies where relevant)?	Partially: A high-level roadmap is available, but no integrated master schedule has been sighted. Jurisdictions and partner agencies do not appear to be working to a well understood baseline. Dependencies and sequencing between streams and jurisdictions remain poorly articulated.
5.2	Milestones: Are the program/project's key milestones compliant with broader government or entity timing requirements?	Partially: Some initial program milestones, such as finalisation of Federation Funding Agreements (FFAs) and development of the National Data Standard, were significantly delayed compared to early expectations. While these have now been completed, the delay has impacted downstream planning, including jurisdictional mobilisation and technical alignment. s 37(2)(b), s 37(2)(c) [redacted] At this stage, there is no integrated master schedule to confirm alignment with broader Commonwealth or jurisdictional timing commitments.
5.3	Schedule: Are the program schedules realistic and achievable and do they include appropriate contingency?	No: Without an integrated master schedule, realism cannot be verified. Interviews indicate delays in design completion, s 37(2)(b), s 37(2)(b), s 37(2)(c), and legal reform. No clear contingency measures are visible.
5.4	Schedule: Is the program/project progressing in accordance with the schedule?	No: s 47B(a), s 47B(b), s 47E(d) [redacted] s 47B(a), s 47B(b), s 47E(d)
5.5	Budget: Is the program/project performing to budget?	s 47B(a), s 47B(b), s 47E(d) [redacted]
5.6	Issues: Have issues emerged and have they been resolved?	Partial: Issues around governance, s 37(2)(b), s 37(2)(c) s 37(2)(b), s 37(2)(c) and partner engagement have emerged. Resolution has been slow or incomplete, particularly where issues span jurisdictions.
5.7	Does the program have a sourcing strategy? Has the program considered re-usable common design patterns either using existing technology or sourcing reusable technology?	s 37(2)(b), s 37(2)(c) [redacted]
5.8	Delivery Strategy: Has a delivery strategy been developed?	Yes: A broad delivery strategy is reflected in the roadmap and PIPB updates.
5.9	Does the program/project have a sound Release/ Staging Strategy?	No: There is no endorsed release strategy. Planning is not progressed sufficiently to develop a release/staging strategy.
5.10	Is functionality being released in line with that strategy?	No: No Functional release planned in current phase across jurisdictions. Design and legal preparatory work is ongoing.
5.11	Where relevant, has user acceptance testing and system end-to-end testing to ensure fitness for purpose been conducted and does the product/element perform to specification?	NA
5.12	Outcomes and Benefits: Is the program/project and its projects on track to deliver the outcome and realise the benefits as specified in the business case?	Yes, noting that further work is required on benefits.

Released under the Freedom of Information Act 1982 (Cth)

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

	Key Focus Area Question	Comments
9.1	Has the current stage successfully completed and has approval been received from the governance committee to proceed with the next stage?	N/A: For the purposes of this Review there is no hard close to current stage.
9.2	Has the entity assessed its readiness to proceed to the next stage?	N/A
9.3	Are the funds available to undertake the next phase?	Yes: However, some streams have identified severe resource constraints and the need to augment funding to recruit additional resources.
9.4	Does the program/project have the capability and capacity (right skills in the right quantity including specialist advice) to deliver the next stage?	Partially. Some agencies are still recruiting or have identified resourcing pressures, and there are risks should certain key personnel leave the program.
9.5	Are the plans for the next phase fit for purpose and achievable?	No: Not sufficiently mature.

Released under the Freedom of Information Act 1982 (Cth)

Appendix D: List of Interviewees

Name	Role/Position/Entity	Date Interviewed
s 22(1)(a)(ii)		23/05/2025
		23/05/2025
		23/05/2025
		23/05/2025
Jeremy Johnson	Executive Director, Business and Partnerships / NFR Senior Responsible Official (SRO) / ACIC	26/05/2025
s 22(1)(a)(ii)		26/05/2025
		26/05/2025
		26/05/2025
		26/05/2025
Heidi Madden	Executive Director, Intelligence and Information Systems NFR Lead Supplier / ACIC	26/05/2025
s 22(1)(a)(ii)		26/05/2025
		26/05/2025
		26/05/2025
		27/05/2025
		27/05/2025
Laurent Berlioz-Nott	National Manager, Capability Support / ACIC	27/05/2025
s 22(1)(a)(ii)		27/05/2025
		27/05/2025
		27/05/2025
		27/05/2025
		27/05/2025
		27/05/2025
		27/05/2025
		28/05/2025
		28/05/2025
		28/05/2025
		28/05/2025
		28/05/2025
		28/05/2025
		28/05/2025
		28/05/2025

Re
m
1982 (Cth)

Name	Role/Position/Entity	Date Interviewed
s 22(1)(a)(ii)		28/05/2025

Released under the Freedom of Information Act 1982 (Cth)

Appendix E: List of Documents Reviewed

	Document Title	Version no. and/or Publication date
1.0	NFR Gateway Review - May 2025 - Cover Page - Focus Area 1 - Business Case	19/05/2025
1.01	CabNet NPP Viewing via AGD	N/A
1.02	NFR FFA Schedule - TAS	09/09/2024
1.03	NFR FFA Schedule – NSW	13/08/2024
1.04	NFR FFA Schedule – WA	05/11/2024
1.05	NFR FFA Schedule – NT	22/07/2024
1.06	NFR FFA Schedule – VIC	20/12/2024
1.07	NFR FFA Schedule – SA	13/08/2024
1.08	NFR FFA Schedule – QLD	27/09/2024
1.09	NFR FFA Schedule – ACT	16/12/2024
1.10	DRAFT – Attachment A – FFA Milestones	DRAFT
2.0	NFR Gateway Review - May 2025 - Cover Page - Focus Area 2 - Benefits	19/05/2025
2.1	NFR Benefits Management Plan	01/04/2025
2.2	NFR Benefits Workshop – 11 Dec 24 – Slide pack	11/12/2025
2.3	NFR Benefits Management Workshop with Partners – 11 Dec 24 – Minutes and Actions	15/01/2025
2.4	NFR Case Studies	01/02/2025
2.5	NFR Benefits Realisation Review 1 – Reporting period ending 31 Mar 25	31/03/2025
3.0	NFR Gateway Review - May 2025 - Cover Page - Focus Area 3 - Stakeholders	19/05/2025
3.01	NFR AGD Factsheet	01/12/2024
3.02	s 47E(d)	04/12/2024
3.03	NFR Program Presentation March 2025 – National Bodies	01/03/2025
3.04	NFR Stakeholder Engagement and Communications Strategy - approved	12/12/2024
3.05	s 47E(d)	20/03/2025
3.06		18/03/2025
3.07		01/04/2025
3.08		18/03/2025
3.09		07/04/2025
3.10		18/03/2025
3.11		14/04/2025
3.12		21/03/2025

Released under Freedom of Information Act 1982 (Cth)

	Document Title	Version no. and/or Publication date
3.13	s 47E(d)	04/04/2025
3.14		24/03/2025
3.15		04/04/2025
3.16		01/04/2025
3.17		07/05/2025
3.18	National Engagement and Communications Action Plan	**DRAFT**
4.0	NFR Gateway Review - May 2025 - Cover Page - Focus Area 4 - End Users	19/05/2025
4.1	NFR Stakeholders & Personas	01/03/2025
4.2	NFR Partners approach to user centred design	19/05/2025
4.3	NFR Program – UX Design Approach - DRAFT	19/05/2025
5.00	NFR Gateway Review - May 2025 - Cover Page - Focus Area 5 - Governance	21/05/2025
5.01	NFR Governance Diagram	N/A
5.02	Terms of Reference – Portfolio Coordination Committee (PCC)	11/02/2025
5.03	Terms of Reference – Partner Implementation Program Board (PIPB)	21/04/2025
5.04	Terms of Reference – National Firearms Register Implementation Steering Committee (NFR ISC)	01/05/2025
5.05	s 47E(d)	01/02/2025 – Under Review
5.06	Terms of Reference – Firearms and Weapons Policy Working Group (FWPWG) - DRAFT	**DRAFT**
5.07	NFR Risk Insight – MAY 25 **N.B.** This document contains the Risk Escalation pathways for the Program on Page 4	01/05/2025
5.08	NFR PCC – 15 Jan 25 – Meeting Pack (Combined)	15/01/2025
5.09	Minutes – NFR PCC – 15 Jan 25	15/01/2025
5.10	NFR PCC – 14 Feb 25 – Meeting Pack (Combined)	14/02/2025
5.11	Minutes – NFR PCC – 14 Feb 25	14/02/2025
5.12	NFR PCC - 13 Mar 25 – Meeting Pack (Combined)	13/03/2025
5.13	Minutes – NFR PCC – 13 Mar 25	13/03/2025
5.14	NFR PIPB – 28 Feb 25 – Meeting Pack (Combined)	28/02/2025
5.15	Minutes – PIPB – 28 Feb 25	28/02/2025
5.16	NFR PIPB - 30 Apr 25 – Meeting pack (Combined)	30/04/2025
5.17	Withdrawn	-
5.18	NFR ISC – 11FEB25 – Meeting Pack (Combined)	11/02/2025
5.19	NFR ISC Minutes – 11 February 2025	11/02/2025

Released under the FOI Act 1982 (Cth) of Information Act

	Document Title	Version no. and/or Publication date
5.20	Gateway Presentation	05/05/2025
5.21	NFR PCC – 14 AUG 24 – Agenda	14/08/2024
5.22	Minutes – NFR PCC– 14 AUG 24	14/08/2024
5.23	NFR PCC – 01 OCT 24 – Meeting Pack (combined)	01/10/2024
5.24	Minutes – NFR PCC – 01 OCT 24	01/10/2024
5.25	NFR PCC – 15MAY25 – Meeting Pack (Combined)	15/05/2025
5.27	NFR PIPB – 12DEC24 – Meeting pack (Combined)	12/12/2024
5.28	Minutes – PIPB 12DEC24	12/12/2024
5.29	NFR Partner Stream Snapshot Report January 2025 - Combined	31/01/2025
5.30	NFR Partner Stream Snapshot Report February 2025 - Combined	28/02/2025
5.31	NFR Partner Stream Snapshot Report March 2025 - Combined	31/03/2025
5.32	NFR Partner Stream Snapshot Report April 2025 - Combined	30/04/2025
6.01	NFR Implementation Roadmap (MAY2025)	19/05/2025
6.02	NFR ConOps model (current state) DRAFT 20250505	**01/05/2025 - DRAFT**
6.03	NFR ConOps model (target state with NFR overlay) DRAFT 20250505	**05/05/2025 - DRAFT**
6.04	NFR Investment Logic Map	17/05/2024
6.05	NFR Change Management Strategy	01/02/2025
6.06	NFR Change Management Plan	01/02/2025
6.07	Change & Adoption Implementation Roadmap	31/03/2025
6.08	NFR Program Internal and External Stakeholder Meeting Log	N/A
6.09	2.01 NFR Blueprint	26/05/2025
6.10	NFR Technical Uplift Project Management Plan	01/12/2024
6.11	NFR Data Quality Project Management Plan	01/11/2024
6.12	NFR Change and Adoption - Project Management Plan	01/01/2025
6.13	NFR Legislation and Policy Project Management Plan	01/02/2025
6.14	NFR Stakeholder Engagement Project Management Plan	01/11/2024
6.15	s 47B(a), s 47B(b)	01/04/2025
7.0	NFR Gateway Review - May 2025 - Cover Page - Focus Area 7 - Risk Management	20/05/2025
7.1	National Firearms Register Risk and Issue Management Plan	01/09/2024
7.2	NFR Master Program Risk Register_V1.0	As of 20/05/2025
8.0	NFR Gateway Review - May 2025 - Cover Page - Focus Area 8 - Technical Uplift	19/05/2025
8.1	Draft AFIN WSIS for NFR showing updates	**DRAFT**
8.2	Draft NFR Solution Proposal	**DRAFT**
8.3	NFR Solution Overview Slide Deck	**DRAFT**
8.4	AGD Target State E2E Firearms Import Permit Process High Level visual	**15/04/2025 - DRAFT**
8.4.1	AGD and ACIC tech collaboration status report	14/05/2025
8.5	NFR Concept Paper - Near Real Time (draft)	**01/03/2025 - DRAFT**
8.6	BA Forum – Digital Services Portal paper	**DRAFT**

Released under the Freedom of Information Act 1982 (Cth)

	Document Title	Version no. and/or Publication date
8.7	BA Forum – Licence and Permit Holder Change Alerts paper	DRAFT
8.8	BA Forum – Cross Border Movements paper	DRAFT
8.9	BA Forum – Licence and Permit Verification Service paper	DRAFT
9.0	NFR Gateway Review - May 2025 - Cover Page - Focus Area 9 - Data Quality	19/05/2025
9.1	National Data Standards v1.0	01/03/2025
9.2	NFID Data Cleansing Plan_PPAs Presentation	01/04/2025
9.3	Ongoing NFID Data cleansing progress report (detailed spreadsheet) [20250512]	As of 12/05/2025
9.4	Ongoing NFID Data cleansing progress report (one summary) [12052025]	As of 12/05/2025
9.5	Proposed NFID Data cleansing timeline	As of 12/05/2025
9.6	AFIN Codelist_PPAs Presentation_April2025	14/05/2025
9.7	AFIN Codelists proposed consultation schedule	As of 12/05/2025
10.0	NFR Gateway Review - May 2025 - Cover Page - Focus Area 10 - Legislation and Policy	20/05/2025
10.01	September 2024 Firearms and Weapons Policy Working Group – National Firearms Register Agenda and Minutes	18/09/2024
10.02	March 2025 Firearms and Weapons Policy Working Group – National Firearms Register Papers and Minutes	05/03/2025
10.03	Schedule of Legislation and Policy Stream Meetings	As of 19/05/2025
10.04	Legislation and Policy Stream Meeting – Hobart, Tasmania April 2025 – Agenda, Pack and Outcomes	10/04/2025
10.05	Legislation and Policy Stream – Priority A Paper 2 – Privacy Protection	DRAFT
10.06	Legislation and Policy Stream – Priority A Paper 3 – Licence Verification	DRAFT
10.07	Legislation and Policy Stream – Priority A Paper 8a – Interstate Movement (Permanent Transfer)	DRAFT
10.08	Legislation and Policy Stream – Priority A Paper 8b – Interstate Movement (Temporary Transfer)	DRAFT
10.09	Legislation and Policy Stream – Priority A Paper 9 – Suppressors	DRAFT
10.10	Stakeholder Engagement Paper on Legislation & Policy Stream – Licence and Permit Verification	As of 19/05/2025
10.11	Stakeholder Engagement Paper on Legislation & Policy Stream – Privacy Protection	As of 19/05/2025
10.12	Stakeholder Engagement Paper on Legislation & Policy Stream – Interstate Movements	As of 19/05/2025
11.01	s 47B(a), s 47B(b)	9 April 2025
11.02		April 2025
11.03		No Date
11.04		No Date

Released under the Freedom of Information Act 1982 (Cth)

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.

Released under the Freedom of Information Act 1982 (Cth)

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).

Released under the Freedom of Information Act 1982 (Cth)

Australian Government
Department of Finance

Released under the Freedom of Information Act 1982 (Cth)

Gateway Review Report (Mid-Stage) Review

For: National Firearms Register Program

To: Jeremy Johnson

This report is the property of the Australian Criminal Intelligence Commission and may only be distributed or reproduced with the permission of the Senior Responsible Official with the exception of projects or programs that include an ICT component, where the report will be shared with the Digital Transformation Agency (DTA).

Entity name:	Australian Criminal Intelligence Commission	
Program/Project name:	National Firearms Register Program	
Review type:	Mid-Stage	
Senior Responsible Official (SRO):	Jeremy Johnson	
Planning Meeting date:	Thursday, 5 March 2026	
Onsite Review dates:	Friday 20 March to Friday, 27 March 2026	
Date report provided to SRO:	Friday 27 March 2026	
Date report provided to Assurance Reviews Unit:	Friday 27 March 2026	
Review Team Leader:	**Name** s 22(1)(a)(ii)	**Signature** s 22(1)(a)(ii)
Review Team Member:	**Name** s 22(1)(a)(ii)ther	
Review Team Member:	**Name** s 22(1)(a)(ii)	
Review Team Member:	**Name** s 22(1)(a)(ii)	
Template version control:	Draft November 2021	

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.

Enquiries regarding the Gateway methodology should be directed to:

Assurance Reviews Unit
Department of Finance
One Canberra Avenue
FORREST ACT 2603
Email: assurancereviews@finance.gov.au

Released under the Freedom of Information Act 1982 (Cth)

Version 223/20 T

Gateway Assurance Dashboard

Delivery Confidence Assessment

Rating

The review team finds that the Delivery Rating assessment for the program is:

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.**

Factors Affecting Rating

While the program has delivered some functionality and made some improvements to governance since the last review there is an overall worsening of delivery confidence.

There is significant support for the urgent need for the outcomes of this program, but there is almost universal scepticism that the program will deliver within the agreed timeframes.

Key factors contributing to this view are struggles to resolve issues, clarify scope, define adoption ready, identify and manage risk and dependencies.

However, review participants associated with delivery have advised that if issues and scope can be resolved quickly delivery could still be achieved.

s 47E(d) [redacted]

Summary of Key Focus Area Ratings

Key Focus Area	Rating
Business Case and Benefits	Amber
Stakeholders and End Users	Red
Governance and Planning	Amber
Risk Management	Amber
Review of Current Phase	Red
Readiness for Next Stage	Red

Summary of Findings

The NFR Program continues to have the strong, broad support of partners and stakeholders. The tragic events at Bondi underlined the need for the system 30 years after the Port Arthur incident and have ensured it remains a government priority to deliver police and community safety. Two years into a four-year timeframe, the Program is at a pivotal point. It still has

Released under the Freedom of Information Act 1982 (Cth)

sufficient runway to be delivered; however, key critical issues need to be addressed to make this happen.

Most importantly, to be successful, the Program needs strong and influential national leadership that is delivered through robust and collaborative relationships. This requires a more dynamic and strengthened leadership approach, driving decisions and delivery.

This needs to be supported by an effective Program team that has all critical roles filled and clear, streamlined responsibilities and accountabilities. The changed program team has built good will through its new approach, and this shift needs to be underpinned by a Program Manager who is structurally and culturally positioned to succeed.

Unclear and creeping scope which has been clouded by broader firearms reforms, indicates that Program outcomes need to be reconfirmed. This grounding of the Program's direction, and clarification of its scope should be the foundation of delivery planning; referring to the original Blueprint.

Work on benefits should be reinvigorated so that the benefits underpin prioritisation, focusing efforts on key issue resolution and driving robust planning. This will help to manage challenging partner demands.

Stakeholder consultation to date has been on policy issues and led by Home Affairs. As delivery is now the focus, the Program needs to consider how it takes on industry and end-user engagement, alongside jurisdictional partners. Specifically, how progress is communicated, readiness for change managed and partner communication is nationally coordinated to retain clarity and buy-in.

Governance has been established but is focused on process at the expense of outcomes. Key planning and design issues remain unresolved and are delaying technical delivery. Risk management is nascent and not yet viewed programmatically, but improvements are underway.

Recent changes to key personnel and approach have been positive and offer a reset, but the honeymoon will be short, and partners are frustrated with ongoing impasses that are hindering delivery. These need to be quickly resolved and certainty of design and planning needs to be high priority.

Summary of Recommendations

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

Item	Recommendation	Urgency
1	Reinforce, consolidate and endorse the NFR Program's outcomes as enduring foundations guiding the Program's scope and delivery. Guidance: Based on the original Blueprint and the commitments to Government for accelerated delivery.	Critical do now
2	Reinvigorate benefits work to underpin delivery prioritisation and focus issue resolution and planning.	Essential November 2026

Released under the Freedom of Information Act 1982 (Cth)

Item	Recommendation	Urgency
3	Ensure NFR's senior leadership focuses on driving a nationally consistent and coherent program through influential engagement with stakeholders, robust and collaborative partner relationships and the establishment of an effective and cohesive ACIC Program team.	Critical do now and ongoing
4	Proactively work with Home Affairs to uplift and transition leadership of stakeholder engagement and communications to the ACIC Program Team. Guidance: Stakeholder engagement and communication include driving overall user design, useability testing, national consistency, change management, progress updates and a clear point of contact.	Essential October 2026
5	Strengthen the operation of governance to drive decision making and streamline reporting, including: • Establishing a quarterly National Program planning cycle with ISC setting priorities, driving delivery and resolving issues. • Rationalise PIPB and DCC into a new PIPB that meets monthly and drives the delivery of quarterly planning increments. • Establish a single, timely, monthly Program report that includes key jurisdictional information and that is used for all levels of governance. • Align work streams to work packages to enable coherent and comprehensive planning and reporting. • Establish a Program decision register capturing key historical and future decisions. Guidance: Senior Program leadership must implement a process to resolve outstanding prioritised design, architectural and scheduling issues with partners working bilaterally and collectively to ensure buy in, aligned to the quarterly planning cycle ACIC and partners need to focus on planning and incrementally delivering the priority elements of the program that are agreed and resolving over time those that are outstanding. This would allow work to get underway while more contentious issues are worked through.	Essential June 2026
6	Resolve key outstanding issues to enable delivery to proceed: • Urgently s 37(2)(b), s 37(2)(c) [redacted] for December 2026.	Critical do now

Released under the Freedom of Information Act 1982 (Cth)

Item	Recommendation	Urgency
7	Mature a focused, consistent risk and dependency management approach by Program leadership: • Expand the risk register to include issues and dependencies in collaboration with all partners, to have an all of program view. • Actively monitor, escalate and address risks and issues.	Essential August 2026
8	Capitalise on the good will built in the Darwin workshop by communicating with partners the workshop outcomes, demonstrating commitment by moving quickly to resolve issues and implement actions.	Critical do now
9	Define, document and communicate the definition of "Adoption Ready" for the delivery of December 2026 commitments and settle an agreed definition for the remainder of the program.	Critical do now
10	Agree with partners more detailed, integrated plans delivered through the quarterly incremental releases including an adoption schedule.	Essential September 2026
11	Conduct a midstage review Guidance: Focused on the achievement of an adoption ready system and set for implementation. Independent assurance between reviews should focus on delivery of Dec 2026 commitments.	Feb 2027

A summary of the previous review recommendations and actions taken can be found at Appendix B. The Program has struggled to successfully complete the previous recommendations. Earlier recommendations are superseded by the recommendations above.

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.

Released under the Freedom of Information Act 1982 (Cth)

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 registered 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 comprises 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.

Released under the Freedom of Information Act 1982 (Cth)

Scope of the Review

This a midstage review covering the following key focus areas:

- Business Case and Benefits
- Stakeholders and End Users
- Governance and Planning
- Risk Management
- Review of Current Phase
- Readiness for Next Stage

Within those key focus areas the review team will consider:

- Overall progress of the program
- How well positioned is the program for successful Integration and Adoption?
- What will contribute to retaining sufficient flexibility to adapt while providing confidence in delivery?
- What further mechanisms are required to support and ensure partner readiness for integration and adoption?
- How can collaboration be maximised to achieve delivery by 1 July 2028?
- Progress against previous review recommendations.

Acknowledgements

The review team would like to thank Jeremy Johnson as the Senior Responsible Official 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 support.

Released under the Freedom of Information Act 1982 (Cth)

Detailed Findings and Recommendations

Key Focus Areas Assessed

Business Case and Benefits

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

Findings:

The NFR business case was approved by National Cabinet on 6 December 2023. 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.

Support for the NFR program (Program) remains high. It delivers on an outstanding reform from the Port Arthur response 30 years ago. The tragic Wieambilla (Qld), Croydon Park (NSW) and most recently Bondi (NSW) shootings, has reinforced widespread support for firearms reform, including the NFR.

NFR delivery is a Government priority with commitments made in late 2025 to complete all Commonwealth milestones by the end of 2026. This is to provide an adoption ready NFR system that will allow states and territories to connect their registries as they are ready through to 2028.

Despite support for the Program, and that it is almost halfway through, s 47B(a), s 47B(b), s 47E(d) [redacted] s 47B(a), s 47E(d) [redacted]

Regardless, there is a need to reconfirm the outcomes to ground the Program's direction, clarify its scope and underpin delivery planning. A Program Blueprint (v3.6) was developed as part of the original business case and continues to be referenced by jurisdictions. This Blueprint provides key information that should be refreshed and agreed with partners as the foundation that documents agreed outcomes and guides the Program's delivery.

To ensure all partners are operating with the same understanding about the Program's parameters, the reinforced outcomes should be accompanied by transparent sharing of the commitments made to Government about accelerated delivery (as noted above).

As noted in the previous report, significant work on benefits management had been undertaken. However, it appears benefits work has stalled and little progress has been made to identify, benchmark and track measures as previously recommended. Furthermore, with the resourcing challenges faced by the Program, allocation of responsibility to benefits management needs to be resolved along with other key program roles.

Given the challenges managing partner demands, the clear identification of benefits could be useful to prioritise within the Program. Specifically, the benefits work should be reinvigorated so that the benefits underpin prioritisation, focusing efforts on key issue resolution and driving robust planning.

Released under the Freedom of Information Act 1982 (Cth)

Recommendations:

1. Reinforce, consolidate and endorse the NFR Program's outcomes as enduring foundations guiding the Program's scope and delivery.

   Guidance: Based on the original Blueprint and the commitments to Government for accelerated delivery.

2. Reinvigorate benefits work to underpin delivery prioritisation and focus issue resolution and planning.

Released under the Freedom of Information Act 1982 (Cth)

Stakeholders and End Users

Assessment Rating:	Red There are significant issues in this Key Focus Area that may jeopardise the successful delivery of the program.

Findings:

s 47B(a), s 47E(d) Consequently, to be successful, it needs strong and influential national leadership that is delivered through robust and collaborative relationships.

A more dynamic and strengthened leadership approach is needed if the NFR is to be delivered in the next two years, and the Commonwealth's commitments met by December 2026. Specifically, the ACIC Program senior leaders need to lean in, owning and shaping the Program holistically (across jurisdictions and within the Commonwealth), regularly referring to its foundation outcomes to stay true to course.

s 47E(d), s 47B(a), s 47B(b) . Practically, this requires proactive and strong bilateral engagement with partners s 47B(a), s 47E(d) , driving efficient decision making through governance forums and clearly guiding the Program team.

On the latter, focus should be given to filling remaining critical roles in the Program team and resolving clear, streamlined responsibilities and accountabilities. Currently, the Program Manager is not set up to succeed both structurally and culturally. Structurally, this position should have authority across the entire Program, including the technical team to manage delivery without additional responsibilities. Culturally, this includes establishing:

- What collaborative and responsive engagement looks like in ACIC and outside, with a first priority to progress Darwin findings quickly
- Clarity around the key outcomes and the Program's foundation commitments.
- Consistent Program language for example s 37(2)(b), s 37(2)(c)

The Program Team (including the technical delivery elements) needs to function and present as a coherent and consistent collective to partners and stakeholders.

Industry and end users

s 47E(d)

s 47E(d)

Released under the Freedom of Information Act 1982 (Cth)

s 47E(d) [redacted] Since these events, Home Affairs is handling a broad range of firearms reform issues and is reducing its engagement in the NFR Program, other than as a partner, as it has largely settled the policy issues for which it is responsible.

As Program delivery gathers pace, ACIC needs to consider how it takes on industry and end-user engagement, alongside jurisdictional partners; how progress is communicated, readiness for change managed and partner communication is nationally coordinated to retain clarity and buy-in. s 47E(d) [redacted] Program leadership should engage with Home Affairs to resolve how this hand-over/transition introducing ACIC as the Program's 'face' would best be managed, resourced and funded.

Jurisdictions

Jurisdictions remain committed to delivery of the NFR. Most acknowledged the recent Program Team changes and the recent Darwin workshop as positive and moving towards an improved collaborative approach.

The Review team heard significant frustration about Program planning, noting it was unclear and did not acknowledge their system delivery dependencies. Jurisdictions and other Commonwealth Agencies also stated concerns about the Program's ability to deliver what they needed within the remaining 2-year timeframe.

In addition, there was confusion about scope and scope creep. For example, respectively, s 37(2)(b), s 37(2)(c) [redacted] that have remained unresolved for too long and were amplifying uncertainty and frustrations.

As noted above, strong senior Commonwealth leadership is needed to ground the Program back to its agreed outcomes and resolve scope and requirements. See the Governance and Assurance Focus Area for Program planning findings and recommendations. In addition, the Program team should conduct regular collaborative partner workshops to resolve key outstanding issues and plan.

s 47B(a) [redacted] Concerted effort by all national leaders to better engage is needed to ensure the program succeeds.

Recommendations:

3. Ensure NFR's senior leadership focuses on driving a nationally consistent and coherent program through influential engagement with stakeholders, robust and collaborative partner relationships and the establishment of an effective and cohesive ACIC Program team.

4. Proactively work with Home Affairs to uplift and transition leadership of stakeholder engagement and communications to the ACIC Program Team.

Released under the Freedom of Information Act 1982 (Cth)

Guidance: Stakeholder engagement and communication include driving overall user design, useability testing, national consistency, change management, progress updates and a clear point of contact.

Released under the Freedom of Information Act 1982 (Cth)

Governance and Planning

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

Findings:

Too many meetings, not enough decisions

Since the previous review the Program has implemented a governance framework, but the framework is presently focused on process at the expense of outcomes. Multiple interviewees reported attending numerous meetings, often with overlapping subject matter, at which issues are raised and discussed repeatedly but without resolution.

Examples were cited of unsuccessful attempts to raise and resolve design issues, agree timeframes, and establish technical requirements for s 37(2)(b), s 37(2)(c) [redacted]

s 47B(a), s 47B(b), s 47E(d) [redacted]

The governance framework conflates governance and management functions, has too many levels, and disjointed cadence. The three levels of senior governance (the ISC, PIPB and DCC) are duplicative. The functions of the PIPB and DCC could readily be combined into a new PIPB that meets monthly. The working groups that are subordinate to the existing DCC are management functions. Their membership frequently overlaps. There is an opportunity to rationalise these groups to reduce duplication of effort, but this will require diligent leadership of the working groups to ensure they remain focused on the job of identifying and resolving issues or escalating them to the governance committees.

s 47B(a), s 47B(b), s 47E(d) [redacted] The ACIC Program team needs to ensure that this does not recur.

The Review Team observed that partner reporting varies significantly in form, and that reporting to various levels of the Program governance framework is duplicative. At minimum, a single monthly report should be created that is informed by working group and Program input and that services all levels of governance. Where possible, closer alignment in format of partner reporting would assist the Program Management Office to spend less time amalgamating information and more time driving Program delivery.

s 47B(a), s 47B(b), s 47E(d) [redacted] The Review Team was unable to locate a decision register that would act as a source of authority for previous decisions. The Program should implement a decision register that captures future and historical decisions. It should be made available to all partners.

Governance needs to drive cadence

The Review Team has recommended that to accelerate decision-making the delivery planning cadence should transition to quarterly increments with clear objectives for each quarter. This planning cadence should be owned and driven by the governance committees. The committees should be responsible for setting the parameters of future planning

Released under the Freedom of Information Act 1982 (Cth)

increments, approving the scope of upcoming planning increments, and critically monitoring and adjusting the progress of planning increments under-way and completed. PIPB should hold decision rights for this process, escalating to ISC only where decisions cannot be reached.

This shift requires a mindset change among the committees, especially the PIPB after it absorbs the DCC. The Review Team has generally observed a level of national senior leadership engagement and understanding of the program that is lower than would be expected for a program of this importance, at this stage, and that is facing significant challenges.

s 47B(a), s 47B(b), s 47E(d) [redacted]. To achieve the desired outcome national senior leadership will need to commit to active governance to drive the quarterly planning increments and to hold the Program to account.

The shift to work packages has confused partners and governance

The decision to shift from work streams to work packages has been a source of significant confusion. s 47B(a), s 47B(b) [redacted].

While a work package focus can be effective for managing technical delivery, the Review Team was unable to identify any material that explained the relationship between work streams and work packages. This creates a significant risk of loss of fidelity and confusion as jurisdictional work streams reporting is translated to Program work package reporting. It is too late and too costly to revert. Instead, an alignment of work streams and work packages should be conducted to enable clear and coherent Program planning and reporting.

Resolve planning impasses to enable delivery

There appears to be broad agreement on the high-level intent of the NFR Program, and artefacts such as the original 2023 Blueprint provide useful high-level guidance. However, below this level there is a planning gap in areas including s 37(2)(b), s 37(2)(c) [redacted]. s 47B(a), s 47B(b), s 47E(d) [redacted]

s 47B(a), s 47B(b), s 47E(d) [redacted]

It is imperative that the program team takes a two-pronged approach to resolving these issues. s 37(2)(b), s 37(2)(c) [redacted]

Re Freedom of Information Act 1982 (Cth)

s 37(2)(b), s 37(2)(c)
s 47B(a), s 47B(b)

ACIC and partners need to focus on planning and incrementally delivering the priority elements of the program that are agreed and resolving over time those that are outstanding. This would allow work to get underway while more contentious issues are worked through.

Recommendations

5. Strengthen the operation of governance to drive decision making and streamline reporting, including:

- Establishing a quarterly National Program planning cycle with ISC setting priorities, driving delivery and resolving issues.
- Rationalise PIPB and DCC into a new PIPB that meets monthly and drives the delivery of quarterly planning increments.
- Establish a single, timely, monthly Program report that includes key jurisdictional information and that is used for all levels of governance.
- Align work streams to work packages to enable coherent and comprehensive planning and reporting.
- Establish a Program decision register capturing key historical and future decisions.

  Guidance: Senior Program leadership must implement a process to resolve s 37(2)(b), s 37(2)(c) with partners working bilaterally and collectively to ensure buy in, aligned to the quarterly planning cycle

  ACIC and partners need to focus on planning and incrementally delivering the priority elements of the program that are agreed s 37(2)(b), s 37(2)(c)

6. Resolve key outstanding issues to enable delivery to proceed:

- Urgently s 37(2)(b), s 37(2)(c) for December 2026.

Released r th eedo f Information Act 1982 (Cth)

Risk Management

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

Findings:

Risk management is emerging but should be much more mature for this stage in the program

The artefacts of risk management are established. The Program has a risk management plan and associated risk register. A risk working group exists as part of the governance framework.

The approach to risk is not yet programmatic. The Review Team observed that there are multiple risk registers within the Program at partner and Program level. The Review Team was unable to trace how risks are mapped from partner to Program risk registers. s 47B(a), s 47B(b), s 4

[redacted]

Historically, risks have not been escalated to issues in a timely manner. The Review Team noted that in March 2026 the risk register was updated, with six risks being proposed for escalation to Program-level issues. Four of these risks are assessed to be HIGH risks. Three of them relate to Program scope, schedule and dependencies, which have been discussed in various governance forums as significant sources of delivery risk since at least the last quarter of 2025. Several interviewees said that recent reinvigoration of the risk working group has enabled more productive discussion and escalation of risks. This effort to mature the management of risk is a positive sign and should continue.

The RAID register is not yet mature. Up to this point the Program has maintained a risk register, not a RAID register. The Review Team understands that work is underway to incorporate dependencies, but at this stage of the Program it is important that a complete and mature RAID register is developed as a matter of priority. The RAID register must be developed in collaboration with all partners and thereafter used to inform governance decision-making.

s 47B(a), s 47B(b), s 47E(d)

[redacted]

Recommendation:

7. Mature a focused, consistent risk and dependency management approach by Program leadership:

- Expand the risk register to include issues and dependencies in collaboration with all partners, to have an all of program view.
- Actively monitor, escalate and address risks and issues.

Released under Freedom of Information Act 1982 (Cth)

Review of Current Phase

Assessment Rating:	Red There are significant issues in this Key Focus Area that may jeopardise the successful delivery of the program.

Findings:

Progress since last Gateway Review

Since the last review numerous Program elements have progressed including:

- Development, review and sign off of 10 Priority A Policy Papers approved following extensive partner engagement and consideration (July and Nov 2025)
- s 37(2)(b), s 37(2)(c) [redacted] (Sept 25)
- Implementation of a Home Affairs portal (Oct 25)
- Development of a detailed Integrated Master Schedule (Oct 25)
- Implementation of an Australian Border Force portal (Nov 25)
- A refresh of the program's leadership team (Nov 25 to Jan 26)
- Responding to recommendations of two previous Gateway Reviews
- Conduct of a Business and Design workshop involving partners from across the program for 2 days in Darwin (Feb 26).
- s 37(2)(b), s 37(2)(c) [redacted]
- s 37(2)(b), s 37(2)(c) [redacted]

The program also introduced a revised governance structure and delivery approach following a review conducted in Aug 2025. Review Team consideration of these is referenced above. Implementation of these changes demanded a considerable investment of program management attention. They figure prominently in ISC papers including revised terms of reference for governance bodies and detailed reporting on progress in responding to earlier Gateway recommendations. This focus may have contributed to creating an illusion of progress in the absence of a visible work plan with clear scope, deliverables and milestones.

Halfway through, halfway done?

The NFR Program is swiftly approaching its halfway point which presents an opportunity to assess whether the Program has accomplished what it needed to achieve at this point.

The Program is not currently over budget. Some funds have been and are about to be shifted into future years, largely from underspending due to resource shortfalls. s 37(2)(b), s 37(2)(c) [redacted]

Therefore, the delivery team is working to rough order of magnitude (ROM) estimates with some contingency provisions. In short, because the scope of outstanding work cannot yet be estimated, management cannot be assured that the remaining funds are sufficient to achieve the goals for the program set by National Cabinet.

Regarding scope, it is not yet possible to determine if the Program has completed half of the necessary work. This is partly because s 37(2)(b), s 37(2)(c) [redacted] but also because generally there is insufficient visibility of the plans and schedules of the partners. At the June meeting of the ISC (reported as the previous meeting's minutes in the ISC November meeting) the Chair noted the imperative that agencies uplift their respective registries, data, systems, and processes for the NFR to meet National Cabinet's objective.

s 47B(a), s 47E(d) [redacted]

Released by the Freedom of Information Act 1982 (Cth)

s 47B(a), s 47B(b)

The

s 47B(a), s 47B(b), s 47E(d)

A Schedule is not a Plan

A detailed Integrated Master Schedule (IMS) was developed in December 2025. This was rejected by the PIPB at its January meeting because it did not accommodate time for the s 37(2)(b), s 37(2)(c), among other reasons. The issue was referred down to the Delivery Coordination Committee for action at its February meeting. The agenda item at DCC generated considerable discussion but did not result in an endorsed schedule, noting further actions were required.

The IMS contains a commendable level of detail. It has been informed by a newly minted NFR Program Integrated Delivery Framework which provides good abstract guidance as to the processes and artifacts that contribute to solution delivery.

While the IMS is well detailed, it provides a schedule that is unconnected to a work plan. To make the schedule live as a plan it needs to be based on estimates from all participants and needs to include milestones, dependencies and a critical path. Without these, management is unable to track progress, adjust resource allocation and consider re-prioritisation of scope details to steer the Program towards successful realisation of the National Cabinet objectives.

Recommendations:

None.

Released under the Freedom of Information Act 1982 (Cth)

Readiness for Next Stage

Assessment Rating:	Red There are significant issues in this Key Focus Area that may jeopardise the successful delivery of the program.

Findings:

For this Review, the "Next Stage" is understood to be from now until the end of December 2026 which is the target date for commitments made to the Minister in September 2025.

To ensure the Program delivers those commitments, several matters need to be successfully addressed, in addition to recommendations provided above:

Take up actions arising from the Darwin workshop urgently

Many stakeholders spoke very positively about the Darwin workshop. Most regarded it as a potential turning point in improving stakeholder engagement. There was a feeling that stakeholders had been heard, issues and priorities tabled, and progress towards resolution begun. The good will engendered by the workshop needs to be fostered through ongoing engagement and delivery to commitments or it will quickly fade.

Follow up from the meeting should include regular, perhaps quarterly, Darwin style workshops along with regular face-to-face meetings with individual jurisdictions by the program leadership and engagement team.

Key actions were documented arising from the workshop. Some relate to specific scope items such as s 37(2)(b), s 37(2)(c). Others refer to Program level actions, particularly those listed under Ways of Working and High-level Solution Overview. If addressed promptly these have the potential to reset Program dynamics towards a more positive outlook.

Under Ways of Working:

- Review and simplify working group structure, ACIC to propose a new way of working.
- Establish a shared issues, risks, and decisions register accessible to partners
- Improve traceability between policy, business requirements, and delivery
- Strengthen multidisciplinary collaboration at the working level
- Strengthen mechanisms for collaboration and knowledge sharing

Under High-level Solution Overview:

- Partners agreed that providing solution overview documentation is valuable and can be used to show where are going as a Program and what it looks like when we get there.
- Partners agreed that sharing solution overview documentation is useful.
- Partners agreed that having an ecosystem of solution architecture documents linking up all partners would be beneficial.

Released under the Freedom of Information Act 1982 (Cth)

Define "adoption ready"

ACIC's commitments to the Minister promise their solution will be "adoption ready" by the December 2026 target date. The term "adoption ready" apparently describes a target completion point for ACIC commitments. s 37(2)(b), s 37(2)(c) [redacted]

This will be relevant both for the Dec 2026 deadline and for subsequent milestones.

Develop an Integrated Master Plan endorsed by all parties

There are many plans at play within NFR: each partner, the business delivery team, the ACIC technical delivery team, the IMS and the Consumable Integrated Master Schedule. Some of these are schedules without some of the content required for them to be used as work plans to functionally track progress, scope, milestones and critical path. None of these are integrated with the others to reflect dependencies and critical paths.

While it would be impractical to attempt to manage a Program of the breadth and complexity of NFR from a single plan document, it is essential that there be an integrated plan at some level. It would also be impractical to attempt to integrate them across the full schedule to June 2028. It should be possible to develop an integrated plan for items in scope of the December 2026 target.

Beyond December, a practical approach could align to what the Review Team understands is the planned approach to solution delivery going forward, which is to define a cadence of delivery releases with scope defined through a prioritisation process with partner consultation. An integrated work plan could be developed and agreed on a rolling basis with greater detail being added as release dates approach.

Recommendations:

8. Capitalise on the good will built in the Darwin workshop by communicating with partners the workshop outcomes, demonstrating commitment by moving quickly to resolve issues and implement actions.

9. Define, document and communicate the definition of "Adoption Ready" for the delivery of December 2026 commitments and settle an agreed definition for the remainder of the program.

10. Agree with partners more detailed, integrated plans delivered through the quarterly incremental releases including an adoption schedule.

11. Conduct a mid-stage review

Guidance Focused on the achievement of an adoption ready system and set for implementation.

Independent assurance between reviews should focus on delivery of Dec 2026 commitments.

Released under the Freedom of Information Act (Cth)

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	Amber
March 2026	Mid-Stage Review	Amber / Red
Feb 2027	Mid-Stage Review	Guidance: Focus on achievement of an adoption ready system and set up for implementation. Independent assurance between reviews should focus on delivery of December 2026 commitments.

Released under the Freedom of Information Act 1982 (Cth)

Appendix B: Previous Recommendations

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.

Released under the Freedom of Information Act 1982 (Cth)

<Guidance: complete the table below if a previous review has been undertaken>

Previous Recommendations and Actions Taken

Item #	Recommendation	Category	Action Taken	Review Team Comments
1	s 37(2)(b), s 37(2)(c), s 47E(d)			s 47B(a), s 47B(b), s 47E(d)

Released under the Freedom of Infor t 1982 (Cth)

Previous Recommendations and Actions Taken				
2	Identify, benchmark and track measures of the benefits expected to be realised across all stakeholder groups (frontline police, community groups, dealers, gun owners and others)	Essential (Do by December 2025)	**In progress.** Record 25/141096: NFR Benefits Measures and Summaries outlines the two primary benefits and three intermediate benefits and supports each with detailed, measurable indicators and final targets. Record 25/132833: NFR Benefits Realisation Review 2 (Reporting period ending 30 June 2025) provides quarterly measurement for benefits currently being realised. NFR PMO officers have participated in DTA's benefits management training. Change and Benefits Manager onboarded 15 December 2025. **Next steps:** Review of Benefits Management Plan and supporting documents to ensure benefits targets measures, and metrics remain aligned with program outcomes. A quarterly benefits progress report will also be developed in March 2026 and will progress to ISC.	Partial Benefits Management has not been active or tracking. Benefits management responsibility in the Program Team continues to be resolved.

Released under the Freedom of Information Act 1982 (Cth)

Previous Recommendations and Actions Taken				
3	Co-ordinate engagement with jurisdictions by AGD and ACIC to maximise the efficiency and effectiveness	Essential (Do by September 2025)	**Complete.** ACIC and HA have undertaken joint engagements with stakeholders and partner agencies since May 2025 and regularly identify opportunities for future joint engagements. ACIC and HA regularly collaborate on program artefacts to ensure mutual understanding and messaging consistency, such as NFR newsletters and NFR policy papers.	**Complete –but will now need refreshing** HA has been the primary 'face' of the Program and are now stepping back. ACIC needs to step in and transition to the NFR Program stakeholder manager. This involves actively coordinating and managing national NFR engagement and communications.
4	s 33(a)(ii), s 37(2)(b), s 37(2)(c)	Critical (Do Now)	**Complete.** s 33(a)(ii), s 37(2)(b), s 37(2)(c)	**Partial** s 33(a)(ii), s 37(2)(b), s 37(2)(c)

Released under the Freedom of Information Act 1982 (Cth)

Previous Recommendations and Actions Taken

5	Strengthen Program Governance by refocusing ISC and PIPB on whole-of-program oversight including • Implementing governance as designed • Clarify and implement escalation processes Recognise the role the jurisdictional governance plays in project delivery	Critical (Do Now)	**Complete.** In late July 2025, the NFR PMO instigated a review of the governance arrangements of the NFR, which included a review of all TORS, the governance framework, the cadence of governance meetings and escalation pathways. The revised governance structure, and TORs have been finalised and operationalised.	Partial Instead of implementing the proposed governance structure, the program instead instigated a review which consumed significant management attention at the expense of delivery. The governance structure is reasonably sound although streamlining opportunities exist.
6	Strengthen Program Level Reporting by: • Increase the frequency of PIPB meeting to monthly • Finalising a consumable integrated master schedule • Ensure Program monthly status reports include whole-of-program financial reporting and a Program RAG status • Provide all partner agency snapshots (including ACIC projects) to governance committees to underpin Program level reporting • Add dependency reporting to the snapshot	Critical (Do Now)	**In Progress.** A six-weekly cadence has been established for the PIPB. ACIC conducted a review of program management in support of this recommendation. Resultantly: - Streams have been removed as a program delivery construct but have been retained at Partner agency level if this is desired by individual agencies. The Program is coordinating projects / work packages and deliver inputs across its delivery partners. - The IMS has been re-designed to support the revised delivery approach. The new format IMS is capability based, and maps activities against work packages. - IMS ownership has been assigned to the SRO, supported by the NFR PMO. The PMO is being resourced to support IMS operations and reporting. Project plans and	**Partial** PIPB remains 6 weekly and out of step with ISC. s 47B(a), s 47B(b), s 47E(d) Financial reporting is not robust. Work stream vs work package is confusing reporting and needs to be better reconciled. Dependencies are not yet being documented

Released under the Freedom of Information Act 1982 (Cth)

Previous Recommendations and Actions Taken

			schedules are being re-assessed at the program level to align with the master view. - Milestone verification will be linked to submission of status reports in the format and with the content required by the Program. ACIC will work with HA to embed verification protocols in the delivery lifecycle to avoid reporting duplication for Partner agencies. - The PMO's program integration function will be enhanced, including integrated cross-stream design, dependency management, and program design governance. PMO resourcing and skills will be uplifted to achieve this. **Next steps:** Work with partner stakeholders to standardise reporting templates and uplift to the snapshot reporting template (delayed). The detailed Integrated Master Schedule was consulted with partners via the Delivery Coordination Committee meeting on 3 February 2026. ACIC working through actions ahead of tabling for PIPB approval. The PMO will develop a Dependency Management Framework (delayed).	
7	Align the chairing of the ISC to the lead agency ACIC and consolidate the secretariat functions	Recommended (Do by September 2025)	**Complete.** The Chair and Secretariat functions of the NFR ISC are now with ACIC. The Deputy CEO of ACIC will Chair the NFR ISC.	Complete This has improved accountability and ownership

Released under the Freedom of Information Act 1982 (Cth)

Previous Recommendations and Actions Taken				
8	Resource the PMO to properly support the ISC and PIPB	Essential (Do by September 2025)	**Complete.** Recruitment activities were commenced in June 2025 and are well advanced for a number of senior positions (EL2 and EL1) and junior officers to appropriately resource the NFR's Secretariat functions. **Note**: ACIC recruitment involves necessary security clearance and suitability checks, which can impact on recruitment timeframes.	**Partial** The Program Team still appears to be lacking resources at levels below EL2 which is limiting the ability to refresh and refine frameworks, monitor and track for reporting. Also, roles and responsibilities
9	Undertake assurance activity tied to key delivery transitions — such as data conformance, legislative readiness, or system integration	Essential (Commence by December 2025)	**Complete.** ACIC appointed an EL2 Director of Planning and Assurance in late 2025, to support delivery against this recommendation. Development of a Delivery Framework guides assurance activities required at each phase and Stage Gate for the delivery of ACIC-led Work Packages. Assurance Plan approved at ISC February 2026 (post DTA support). Remediation Plan noted at ISC February 2026.	**Partial** While frameworks are in place assurance work remains nascent.
10	Identify and compile Program level risks, issues and dependencies from existing material into a Program level RAID log	Essential (Do by September 2025)	**Complete.** Monthly risk reviews have been underway since the beginning of the 2025 calendar year. Risks are also identified and recorded as required during the intervening period. Risks are captured from snapshot reports, workshop outcomes/notes, ad hoc meetings with partners, FFA reporting and as identified by the NFR PMO.	**Partial** **See risk section of the report** The Risk Working Group has been improved and is active. Issues continue to need focus and work.

Released under the Freedom of Information Act 1982 (Cth)

Previous Recommendations and Actions Taken				
			Dependencies are identified across work packages and via the master schedule, this element is in the final stages of development. A monthly cross-program Risk Working Group has been established, which formalises risk reviews and requires participation by all partner agencies. Monthly reviews of the Risk Register are underway.	
11	Conduct a workshop with all delivery partners to confirm the RAID log content and treatments	Essential (Do by September 2025)	**Complete.** This is a function of the newly established NFR Program Planning and Assurance function and will be achieved though the NFR Risk Working Group. Inaugural meeting of Risk Working Group completed in December 2025; meetings now on regular monthly cadence. Risk Working Group Terms of Reference and Risk and Issues Management Plan endorsed by Risk Working Group on 6 January 2026. Risk and Issues Management Plan and Risk Working Group TORs endorsed by PIPB (28 January 2026). NFR Program Risk Register distributed to Risk Working Group ahead of February 2026 meeting. Meeting included discussion of risk and issue register contents. The contents of the Risk and Issue Registers continue to be overseen by the PMO and Risk Working Group.	See above.

Released under the Freedom of Information Act 1982 (Cth)

Previous Recommendations and Actions Taken				
12	Introduce a structured readiness self-assessment process for jurisdictions and Commonwealth partners	Essential (Do by December 2025)	**In progress.** s 47B(a), s 47E(d) **Next steps:** A consistent self-assessed readiness metric will be included in partner reporting, developed in consultation with partner agencies s 47B(a), s 47E(d) Informed by the master schedule and partner reporting, monthly assessments will be made on partner readiness against each identified work package by the NFR PMO. Quarterly Change Readiness Assessments will also be conducted by the NFR's Partnership and Integration Section.	Not yet available.
13	Recruit additional resources in the PMO to manage a Program of this complexity and resource the legislative and stakeholder engagement streams to appropriate level	Critical (Do Now)	**Complete.** Recruitment activities were commenced in June 2025 and are well advanced for a number of senior positions (EL2 and EL1) and junior officers to appropriately resource the PMO. All three EL2 recruitment rounds are now complete. **Note:** ACIC recruitment involves necessary security clearance and suitability checks, which can impact on recruitment timeframes.	Partial See note above at 8.

Released under the Freedom of Info... Act 1982 (Cth)

Previous Recommendations and Actions Taken				
14	Identify high-risk delivery roles across policy, technical, and stakeholder streams, and implement succession planning, cross-skilling, and targeted resourcing to mitigate disruption and loss of institutional knowledge	Critical (Do Now)	**Complete.** High-risk delivery roles were identified within the NFR PMO, and targeted recruitment to address were advanced. s 37(2)(b), s 37(2)(c) The DSRO has an active role in NFR resourcing and sustainability. New PMO sections are designed give up/down coverage and support to high-risk delivery roles. One of these teams will have a dedicated resource planning function, and implement succession planning, cross-skilling, and targeted resourcing activities.	Partial The program has had a high turnover including critical roles With relatively recent recruitment the Program team continues to be bedded in and in some places under resourced. It does not appear that this has yet occurred.
15	Conduct a Mid Stage Review	By March 2026	**Underway.**	Complete

Released under the Freedom of Info t 1982 (Cth)

Appendix C: Review Checklist

Consistent with *Resource Management Guide 106: Australian Government Assurance Reviews*, this section contains the review team's assessment[1] of the program against each of the Key Focus Areas. Review teams apply their collective expertise to determine the relevance and appropriateness of each question below with regard to the program and review stage.

The review team provides an assessment against each of the questions to allow a level of granularity and assist entities to identify and address the key issues. The overall delivery confidence assessment for the review is provided in the Dashboard.

The review team considers the individual Key Focus Area assessment ratings below and exercises its own judgement and expertise to determine the most suitable overall assessment of delivery confidence.

Business Case and Benefits:

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

	Key Focus Area Question	Comments
1.1	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 need for the program is stronger than ever.
1.2	Options: Is the preferred way forward still appropriate?	Yes, Federated system model remains appropriate
1.3	Value for Money: Are the proposed delivery arrangements likely to achieve value for money?	Not Assessed
1.4	Affordability: Are the costs within current budgets? Is the program/project funding affordable and supported by key stakeholders?	Yes. Not fully assessed. Program is currently underspending and needs to reconcile its staffing profile to delivery. It is unclear whether progress is commensurate with spend.
1.5	Achievability: Is the entity still realistic about its ability to deliver the outcomes and realise benefits?	Partial The program benefits are achievable if design issues are quickly resolved
1.6	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?	s 47B(a), s 47B(b)
1.7	Benefits: Are the outcomes delivered and the benefits to be realised understood and agreed to with benefit owners?	Partial. Benefit ownership is not clear
1.8	Benefits: Is there a strategy and plan for realising benefits? Is it current?	Partial. Benefit plan needs reinvigorating and tracking

Released under the Freedom of Information Act 1982 (Cth)

Stakeholders and End Users:

Assessment Rating: Red There are significant issues in this Key Focus Area that may jeopardise the successful delivery of the program.

	Key Focus Area Question	Comments
2.1	Have the stakeholders and their areas of interest been identified, and do they support the program/project?	Yes, there is overall support for the program
2.2	Is this a whole of government initiative or are other agencies involved in design, development or delivery?	Yes, this is complex multi-agency, multi jurisdiction initiative
2.3	Have stakeholder and end-user needs been taken into account in the design and delivery strategy?	s 47B(a), s 47B(b) [redacted] s 47B(a), s 47B(b) [redacted]. More should be done
2.4	Do stakeholders continue to support the approved business case and the selection of the preferred option? (This includes the potential or recommended delivery approach and mechanisms.)	Yes
2.5	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?	There is no stakeholder engagement strategy and stakeholder engagement is referred to in the report
2.6	Are stakeholders confident outcomes will be achieved when expected?	No, there is confusion and a lack of planning clarity
2.7	Do stakeholders feel sufficiently engaged?	

Released under the Freedom of Information 1982 (Cth)

Governance and Planning:

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

	Key Focus Area Question	Comments
3.1	Is there an overall program governance framework in place and is it fit for purpose? Has a steering committee, or equivalent, been established to oversee the project and is it effective?	Yes, but it is excessively complex and resource-intensive, which impacts decision-making and delivery. There are too many governance layers with some duplication. Cadence of governance does not support timely decision-making and is not well-placed to support the accelerated delivery expectations of government. Lower-level management and working group functions are reflected in the governance framework but do not and should not perform a governance function.
3.2	If other agencies are involved in design and delivery, how are they included in the governance framework?	Yes. All relevant Commonwealth and State and Territory entities are involved in governance at senior level and in working groups.
3.3	Are program and project controls effective?	No. Baseline artefacts exist but it is not apparent that they are used to support effective decision-making.
3.4	Is there a change management process in place covering both program and organisational change requests? Is it effective?	No. Change processes appear to be occurring within individual jurisdictions in accordance with ITIL practice, but there is no functioning change process for program scope changes or other cross-program issues.
3.5	Are there adequate controls over scope change? Is there executive visibility? Have necessary approvals (including at government level) been secured?	No. Persistent unresolved questions about scope indicate that controls for scope definition and change are not effective.
3.6	Is there a quality high level design? Does it contain sufficient detail to allow scheduling and alignment of the work to be delivered? Has it been signed off by the appropriate governance forum?	No. There is good strategic guidance material (e.g. the Blueprint) but a gap in high-level design that is precluding the development of adequate requirements and an agreed schedule.
3.7	Is there executive level commitment to the program? Are responsibilities clear? Are key positions staffed?	Partially. There is a strong sense of commitment to the delivery of the intent of the NFR across all stakeholder groups, backed by Executive-level commitment. However, ownership of decision rights is not always clear, resulting in inertia over some key decisions. The program has a high vacancy rate overall, and especially in some key Program and technical delivery areas. However, this does not appear to be a high-order issue for interviewees.

Released under the Freedom of Information Act 1982 (Cth)

Risk Management:

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

	Key Focus Area Question	Comments
4.1	Is there an organisational framework for managing risks, assumptions, issues and dependencies (RAID) associated with this program/project?	Partially. A risk register has been maintained for some time but not actively managed. There is now a Risk and Issues register but work on Dependencies is very immature and there is no dependency register.
4.2	Have the major risks been identified and are risk owners appointed? Are the risks being effectively managed?	Partially. Risks have been identified but the risk register has lacked broad perspectives and a programmatic approach. It is apparent that risks have not been adequately appointed to owners and addressed in a systematic manner. Risks have not been actively managed. Recent work appears to have improved the administration of the risk management process and risk communication within the program; there is intent to mature risk management including through greater engagement with jurisdictions, but resourcing is likely to challenge the ability to deliver.
4.3	Are there specific high level risks that might affect this program arising from, for example, multiple delivery entities, program complexity, novelty, technology, cyber issues, complex supplier arrangements or multiple stakeholders?	Yes. There are stakeholders from the Commonwealth, States and Territories and Industry. There are delivery entities from the Commonwealth and all States and Territories.
4.4	Is the RAID log regularly reviewed and updated regularly and briefed to governance committees and management as appropriate?	No. The Risk Register has been available to committees but not used effectively to support program decisions. Recent adjustments indicate the Risk Register Is beginning to be used at working group level. It is intended that it will be used to support governance decisions, but this has not yet occurred.
4.5	Have assurance arrangements for the program/project been put in place and is there an Assurance Plan?	Partially. There is a DTA Assurance Plan and a Program Assurance Plan which notes that an independent assurance expert will be appointed when the program mobilises. At the halfway point of the program the independent assurance expert has been engaged but is yet to be onboarded.
4.6	Are there contingency plans that address risks as necessary?	No. There is a framework that envisages contingency plans but no evidence that they are being developed in a systematic manner or applied.

Released under the Freedom of Information Act 1982 (Cth)

Review of Current Phase:

Assessment Rating: Red There are significant issues in this Key Focus Area that may jeopardise the successful delivery of the program.

	Key Focus Area Question	Comments
5.1	Is there an integrated master schedule showing the program/project milestones along with the milestones and interdependencies of programs/projects (Including those managed by other agencies where relevant)?	No. An integrated master schedule (IMS) was compiled in early 2026 but was rejected by the PIPB because it did not provide sufficient time for s 37(2)(b), s 37(2)(c) s 37(2)(b), s 37(2)(c) The IMS does not include milestones or interdependencies. In fact, NFR has not developed a dependency register. Jurisdictions are included in the schedule but did not provide input. The schedule is based on an Integrated Delivery Framework (Dec 2025) that provides a good abstract framework for planning except that its definition of "Done" does not include benefit realisation.
5.2	Milestones: Are the program/project's key milestones compliant with broader government or entity timing requirements?	No. There appears to be no milestones defined for the program. Jurisdiction plans are not visible to the program and cross entity timing does not appear to have been considered. Timing and planning across the Business and Technical program delivery teams does not appear to be synchronised sufficiently.
5.3	Schedule: Are the program schedules realistic and achievable and do they include appropriate contingency?	No. The program schedule (IMS) is not able to be managed as a plan. The program is unable to tell whether targets are achievable. There is no explicit resource or funding contingency under management.
5.4	Schedule: Is the program/project progressing in accordance with the schedule?	No. There is no active schedule apart from a Dec 2026 deadline to meet commitments made to the Minister.
5.5	Budget: Is the program/project performing to budget?	Partially. The program is not over budget. Due to under resourcing, funding is being shifted to later stages. It is not clear, though, that funding is sufficient to achieve program outcomes.
5.6	Issues: Have issues emerged and have they been resolved?	Partially. Issues have only recently begun to be raised from risks as they materialise. These are not yet resolved.
5.7	Does the program have a sourcing strategy? Has the program considered re-usable common design patterns either using existing technology or sourcing reusable technology?	s 37(2)(b), s 37(2)(c)
5.8	Delivery Strategy: Has a delivery strategy been developed?	Partially, one is under development following on from the Darwin workshop. An integrated delivery framework has been developed.
5.9	Does the program/project have a sound Release/ Staging Strategy?	Partially, one is under development following on from the Darwin workshop.
5.10	Is functionality being released in line with that strategy?	s 37(2)(b), s 37(2)(c)
5.11	Where relevant, has user acceptance testing and system end-to-end testing to ensure fitness for purpose been conducted and does the product/element perform to specification?	Partially. Too early to say, although this in included in the Integrated Delivery Framework which was the basis for the IMS and could be expected to be the basis for further planning.

Released under the Freedom of Information Act 1982 (Cth)

5.12	Outcomes and Benefits: Is the program/project and its projects on track to deliver the outcome and realise the benefits as specified in the business case?	Partially. Benefits Management is receiving renewed focus, and all parties are strongly committed to realising the program's intended benefits, but a renewed focus on benefits and outcomes is required to bring them back to front of mind.

Released under the Freedom of Information Act 1982 (Cth)

Readiness for Next Stage

Assessment Rating: Red There are significant issues in this Key Focus Area that may jeopardise the successful delivery of the program.

	Key Focus Area Question	Comments
9.1	Has the current stage successfully completed and has approval been received from the governance committee to proceed with the next stage?	No, there is a lack of clarity underpinning the Program and significant areas of confusion and contention. Delivery within committed timeframes is uncertain.
9.2	Has the entity assessed its readiness to proceed to the next stage?	No
9.3	Are the funds available to undertake the next phase?	Yes, although there is no clarity about whether the Program's spending is commensurate with delivery
9.4	Does the program/project have the capability and capacity (right skills in the right quantity including specialist advice) to deliver the next stage?	Partial. This is improving; however, the Program team remains under resourced.
9.5	Are the plans for the next phase fit for purpose and achievable?	Unable to determine as planning is not clear or agreed.
9.6	Are the governance arrangements for the next stage fit for purpose?	Partial. See recommendations in Governance section above.

Released under the Freedom of Information Act 1982 (Cth)

Appendix D: List of Interviewees

Name	Role	Program position	Organisation / department	Date interviewed
Jeremy Johnson	Executive Director Policing Information and Checking Services Division	Senior Responsible Owner	Australian Criminal Intelligence Commission	20 March 2026
Laurent Berlioz-Nott	National Manager National Policing Information Branch	Deputy Senior Responsible Owner	Australian Criminal Intelligence Commission	20 March 2026
s 22(1)(a)(ii)				20 March 2026
				20 March 2026
				20 March 2026
				20 March 2026
				20 March 2026
				24 March 2026
				20 March 2026
				23 March 2026
				23 March 2026
				23 March 2026
				23 March 2026
Eneasz Sokolowski	National Manager Finance and Enterprise Support Branch & Chief Financial Officer	ACIC CFO	Australian Criminal Intelligence Commission	23 March 2026
Heidi Madden	Executive Director Intelligence and Information Systems Division	Technical Delivery Project Executive Sponsor	Australian Criminal Intelligence Commission	23 March 2026
s 22(1)(a)(ii)				23 March 2026

Release

1982 (Cth)

s 22(1)(a)(ii)				23 March 2026
				23 March 2026
				23 March 2026
				23 March 2026
				23 March 2026
				23 March 2026
				23 March 2026
				24 March 2026
				24 March 2026
				24 March 2026
				24 March 2026
Angela Barrett	Chief Operations Officer	NFR Executive Sponsor	Australian Criminal Intelligence Commission	24 March 2026
s 22(1)(a)(ii)				24 March 2026
Stewart Sibree	National Manager Systems Design and Delivery	Technical Delivery Project Senior Responsible Owner	Australian Criminal Intelligence Commission	24 March 2026
s 22(1)(a)(ii)				24 March 2026
				24 March 2026
				24 March 2026
				24 March 2026

Re under FOI Act 1982 (Cth)

Heather Cook	Chief Executive Officer	ACIC CEO	Australian Criminal Intelligence Commission	24 March 2026
s 22(1)(a)(ii)				24 March 2026
				24 March 2026
				25 March 2026
				25 March 2026
				25 March 2026
				25 March 2026
				25 March 2026
				25 March 2026
				25 March 2026
				25 March 2026
				25 March 2026
				25 March 2026
				25 March 2026
				25 March 2026

Rele
t 1982 (Cth)

Appendix E: List of Documents Reviewed

FOCUS AREA 1: BUSINESS CASE AND BENEFITS

Doc #	Title
1.01	*Cabinet documents: New Policy Proposal*
1.02	Benefits Management Plan

FOCUS AREA 2: STAKEHOLDERS AND END USERS

Doc #	Title
2.01	FFA Schedule - ACT
2.02	FFA Schedule - NSW
2.03	FFA Schedule - NT
2.04	FFA Schedule - QLD
2.05	FFA Schedule - SA
2.06	FFA Schedule - TAS
2.07	FFA Schedule - VIC
2.08	FFA Schedule - WA
2.09	Engagement Paper - Dealer Requirements - May 2025
2.10	Engagement Paper - Interstate Movements - May 2025
2.11	Engagement Paper - Licence and Permit Verification - May 2025
2.12	Engagement Paper - Privacy Protection - May 2025
2.13	Engagement Paper - Treatment of court and other delegated orders - May 2025
2.14	Engagement Paper - Near real-time - September 2025
2.15	Engagement Paper - Suppressors - September 2025
2.16	Feedback paper 1 to national stakeholders 20 Nov 25
2.17	Priority 2 - Engagement Paper - Firearm Borrowing Lending - August 2025
2.18	Priority 2 - Engagement Paper - Firearms Categories - August 2025
2.19	Priority 2 - Engagement Paper - Licences - August 2025
2.20	Legislation and Policy Lead - Meetings
2.21	Stakeholder Engagement Lead - Meetings
2.14	Engagement Paper - Near real-time - September 2025
2.15	Engagement Paper - Suppressors - September 2025
2.16	Feedback paper 1 to national stakeholders 20 Nov 25
2.17	Priority 2 - Engagement Paper - Firearm Borrowing Lending - August 2025

Released under the Freedom of Information Act 1982 (Cth)

2.18	Priority 2 - Engagement Paper - Firearms Categories - August 2025
2.19	Priority 2 - Engagement Paper - Licences - August 2025
2.20	Legislation and Policy Lead - Meetings
2.21	Stakeholder Engagement Lead - Meetings

FOCUS AREA 3: GOVERNANCE AND PLANNING

Doc #	Title
3.01	NFR Program Governance Structure
3.02	Terms of Reference - National Firearms Register Implementation Steering Committee (NFR ISC)
3.03	Terms of Reference – Partner Implementation Program Board (PIPB)
3.04	Terms of Reference - Delivery Coordination Committee (DCC)
3.05	Terms of Reference - Business Design and Technical Working Group (BDTWG)
3.06	Terms of Reference - Risk Working Group (RWG)
3.07	Terms of Reference - Legislation & Policy Working Group (LPWG)
3.08	Terms of Reference - Data Quality Working Group (DQWG)
3.09	NFR Organisation Structure
3.10	National Firearms Register - Solution Blueprint
3.11	NFR Investment Logic Map (ILM) V1.0
3.12	NFR ConOps model (current state)
3.13	NFR ConOps model (target state with NFR overlay)
3.14	NFR Program Management Plan
3.15	Technical Delivery Project Management Plan (PMP) v0.9
3.16	Data Quality Project Management Plan (PMP) v1.0
3.17	Integrated Delivery Framework
3.18	Consumable Integrated Master Schedule (version 1.0, approved)
3.19	Consumable Integrated Master Schedule (version 2.0, not yet approved)
3.20	Detailed Integrated Master Schedule (version 1.0, not yet approved)
3.21	Technical Delivery Project Schedule (current baseline) V1.0
3.22	Assurance Plan
3.23	Remediation Plan
ISC: Governance Meeting documents	
3.24	Implementation Steering Committee - November 2025 - Meeting Pack

Released under the Freedom of Information Act 1982 (Cth)

3.25	Implementation Steering Committee - November 2025 - Minutes
3.26	Implementation Steering Committee - December 2025 - Meeting Pack
3.27	Implementation Steering Committee - December 2025 - Minutes
3.28	Implementation Steering Committee - February 2026 - Meeting Pack
3.29	Implementation Steering Committee - February 2026 – Minutes
PIPB: Governance Meeting documents	
3.30	Partner Implementation Program Board - December 2025 - Meeting Pack
3.31	Partner Implementation Program Board - December 2025 - Minutes
3.32	Partner Implementation Program Board - January 2026 - Meeting Pack
3.33	Partner Implementation Program Board - January 2026 - Minutes
3.34	Partner Implementation Program Board - March 2026 - Meeting Pack
DCC: Governance Meeting documents	
3.35	Delivery Coordination Committee – December 2025 - Agenda
3.36	Delivery Coordination Committee - February 2026 - Agenda
3.37	Delivery Coordination Committee - February 2026 - Minutes
3.38	Delivery Coordination Committee - March 2026 - Meeting Pack
3.39	Delivery Coordination Committee - March 2026 – Minutes (draft)
RWG: Governance Meeting documents	
3.40	Risk Working Group - January 2026 - Agenda
3.41	Risk Working Group - January 2026 - Minutes
3.42	Risk Working Group - February 2026 - Agenda
3.43	Risk Working Group - February 2026 - Minutes
3.44	Risk Working Group - March 2026 - Agenda
3.45	Risk Working Group - March 2026 – Minutes *Draft Minutes provided as a supplementary document, refer 8.04*
DQWG: Governance Meeting documents	
3.46	Data Quality Working Group - December 2025 - Agenda
3.47	Data Quality Working Group - January 2026 - Agenda
3.48	Data Quality Working Group - January 2026 - Minutes
BDTWG: Governance Meeting documents	
3.49	Business Design and Technical Working Group - December 2025 - Agenda
3.50	Business Design and Technical Working Group - January 2026 - Agenda
3.51	Business Design and Technical Working Group - January 2026 - Minutes
3.52	Business Design and Technical Working Group - February 2026 - Agenda

Released under the Freedom of Information Act 1982 (Cth)

3.53	Business Design and Technical Working Group - February 2026 – Minutes (Darwin event outcomes)
Technical Delivery project: Governance Meeting documents	
3.54	Tech Delivery Project - Agenda - October 2025
3.55	Tech Delivery Project - Presentation pack - October 2025
3.56	Tech Delivery Project - Status Report - October 2025
3.57	Tech Delivery Project - Minutes - October 2025
3.58	Tech Delivery Project - Agenda - November 2025
3.59	Tech Delivery Project - Presentation pack - November 2025
3.60	Tech Delivery Project - Status Report - November 2025
3.61	Tech Delivery Project - Minutes - November 2025
3.62	Tech Delivery Project - Agenda - February 2026
3.63	Tech Delivery Project - Presentation pack - February 2026
3.64	Tech Delivery Project - Status Report – January 2026
3.65	Tech Delivery Project - Minutes - February 2026

FOCUS AREA 4: RISK MANAGEMENT

Doc #	Title
4.01	Risk and Issues Management Plan
4.02	NFR Program Risk Register *as at 6 March 2026*
4.03	NFR Program Issues Register *Issues Register as at 23 March 2026 provided as a supplementary document, refer 8.05*
4.04	NFR Technical Delivery Project Risk Register
4.05	NFR Data Project Risk Register

FOCUS AREA 5: REVIEW OF CURRENT PHASE

Doc #	Title
5.01	NFR Dashboard - February 2026
5.02	NFR Dashboard - January 2026
5.03	NFR Dashboard - December 2025
5.04	NFR Partner Stream Snapshot Report - Combined (Feb 2026)
5.05	NFR Partner Stream Snapshot Report - Combined (Jan 2026)
5.06	NFR Partner Stream Snapshot Report - Combined (Dec 2025)
5.07	Progress/status of FFA payments [Home Affairs]
5.08	NFR Policy Paper - PA-01 - Information Sharing - V1.1

Released under the Freedom of Information Act 1982 (Cth)

5.09	NFR Policy Paper - PA-02 - Privacy Protection - V1.1
5.10	NFR Policy Paper - PA-03 - Licence & Permit Verification - V1.1
5.11	NFR Policy Paper - PA-04 - Dealer Requirements - V1.1
5.12	NFR Policy Paper - PA-05 - Key Definitions - V1.1
5.13	NFR Policy Paper - PA-06 - Treatment of Court and Other Delegated Orders - V1.1
5.14	NFR Policy Paper - PA-07 - Near Real-Time - V1.0
5.15	NFR Policy Paper - PA-08 - Interstate Movements - V1.0
5.16	NFR Policy Paper - PA-09 - Suppressors - V1.0
5.17	NFR Policy Paper - PA-10 - Firearm Borrowing and Lending - V1.0
5.18	National Data Standards v1.0
5.19	Data Cleansing Weekly Status Report – 10 Feb 2026
5.20	Data Cleansing Weekly Status Report – 16 Feb 2026
5.21	Data Cleansing Weekly Status Report – 23 Feb 2026

FOCUS AREA 6: READINESS FOR NEXT STAGE

Doc #	Title
6.01	Business Requirements and Technical Requirements Progress Update
6.02	Acceptance Certificate - NFR - WP 1 - Draft
6.03	Acceptance Certificate - NFR - WP 2.1 - Draft
6.04	NFID Portal Enhancements - Change, Engagement & Readiness Model
6.05	DTA Major Digital Projects Report February 2026
6.06	NFR Full Term Financial Forecasting
6.07	NFR Change Request - Rollover of funds

PARTNER DOCUMENTS

Doc #	Partner	Supplied (Yes/No)	Documents provided
7.01	ACT Government	Yes	s 47B(a), s 47B(b)
7.02	ACT Policing	No	N/A
7.03	Australian Border Force	Yes	Program Delivery Working Group Pack December 2025

Released under the Freedom of Information Act 1982 (Cth)

			Program Delivery Working Group Pack February 2026 Program Delivery Working Group Pack November 2025 Risk Register Program Management Plan Project Initiation Document – Technical Uplift Stream
7.04	Australian Federal Police	No	N/A
7.05	Department of Defence	No	N/A
7.06	NT Police Force	Yes	s 47B(a), s 47B(b)
7.07	Queensland Police Service	Yes	
7.08	South Australia Police	Yes	
7.09	Tasmania Police	Yes	
7.10	Victoria Police	Yes	
7.11	Western Australia Police Force	Yes	

SUPPLEMENTARY DOCUMENTS

Released under the Freedom of Information Act 1982 (Cth)

Doc #	Title
-	NFR Stage 3 Gateway Review presentation – 5 March 2026
-	NFR Gateway Review March 2026 – Interview Schedule
-	2025-26 MYEFO Movement of Funds Reclassifications Reallocations *(hard copy version)*
-	Email - 2025-26 MYEFO Movement of Funds Reclassifications Reallocations *(hard copy version)*
-	Signed MS25-003203 - National Firearms Register - Implementation Acceleration *(hard copy version)*
-	Attachment A - Commonwealth NFR activity timeline *(hard copy version)*
-	Attachment B - NFR Commonwealth Delivery *(hard copy version)*
-	Attachment C - NFR Overview *(hard copy version)*
8.01	NFR Technical Delivery Project – Project Change Request 0 #1 (Dec 2025)
8.02	Commonwealth NFR expedited delivery timeline
8.03	NFR – Internal Communications – Newsletter – March 2026 edition
8.04	Risk Working Group Meeting Minutes – 10 March 2026 - Draft *This relates to document ID 3.45 which was unable to be provided earlier*
8.05	NFR Program Issues Register – as at 23 March 2026 *This relates to document ID 4.03 which was unable to be provided earlier*
8.06	NFR Stakeholder Feedback Paper 2
8.07	Acceptance Certificate – NFR - WP 1 NFID Public Portal (SRO endorsed)
8.08	Acceptance Certificate – NFR - WP 2.1 NFID Partner and Management Portals (SRO endorsed)

Released under the Freedom of Information Act 1982 (Cth)

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.

Released under the Freedom of Information Act 1982 (Cth)

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).

Released under the Freedom of Information Act 1982 (Cth)