

To: Department of the Prime Minister and Cabinet
PO Box 6500
Canberra ACT 2600
Australia

Dear sir/madam,

Re: ACCA's Comments on Australia's ICT Procurement Taskforce Consultation Paper

The Asia Cloud Computing Association (ACCA) thanks the Department of the Prime Minister and Cabinet for the opportunity to comment on the ICT Procurement Taskforce Consultation Paper. From our engagement with members of the ICT community in Australia and elsewhere in Asia Pacific, we know that there are myriad opportunities to use technology to improve efficiency and accuracy in public services, as well as create new services for the next generation of technology users.

A growing number of the world's most innovative technologies are built on cloud computing technologies. From wearable technologies to the Internet of Things, from Smart Cities to driverless cars – much of the next generation of technologies will be built on the concept of sharing information through APIs and other cloud-based technologies which will require a method of procuring ICT services and sharing parts of information with others.

We support the Australian government's commitment to a cloud-first policy in public services.¹ We believe that procurement processes can be better adjusted to cater to cloud computing services, which have the following characteristics: (1) on-demand self-service, (2) broad network access, (3) resource pooling, (4) rapid elasticity, and (5) measured service.²

The current model of government procurement does not often take advantage of these characteristics to enact digital transformation in the public sector.

Review Procurement Methods: Micro-Procurement, On-Demand Purchases, Subscription Models

For example, overnment procurement is often done in large contracts, which often alienate smaller (SME), nimbler players from the procurement process, as well as prevent more innovative government agencies from experimenting with new services (e.g. if they have "missed the procurement window".)

- We suggest that large procurements can be broken down to smaller slices, which can be enacted where necessary on demand, where agencies can set micro-objectives which are easier to track, and which will render a larger slate of services available to the public sector.
- Government services should also be re-gearred to allow for subscription models of ICT procurement, instead of the previous "procure once" model.

Qualifying Thresholds

¹ <https://www.finance.gov.au/cloud/>

² <http://nvlpubs.nist.gov/nistpubs/Legacy/SP/nistspecialpublication800-145.pdf>

Through our interaction with members and other ICT players in the region, there is the perception that there is a very high threshold for qualifying to be a cloud and ICT vendor to the Australian government, in the form of needing to attain the Australian Signals Directorate's Information Security Registered Assessors Program (ASD IRAP) Certification.³ The time, effort, and total cost for SMEs to be certified has led to a natural exclusion process from government procurement opportunities.

Education and Industry Consultation

The ACCA is the apex industry association in Asia Pacific that represents stakeholders of the Cloud Computing ecosystem to government and other stakeholders. Our mission is to accelerate the adoption of Cloud computing through Asia Pacific by helping to create a trusted and compelling market environment, and a safe and consistent regulatory environment for Cloud computing products and services.

We would be pleased to work with the government during your procurement planning to educate and train your procurement, legal, and business functions, to better understand cloud offerings which are available. We would also welcome the reverse – to have debriefs from agencies following procurement processes, to better understand government requirements so that ICT vendors can refine products, commercial models, and partnerships, which will best suit the government procurement process.

This mutual sharing of information will enable the development of a robust and flexible ICT procurement process for Australia's public sector.

The ACCA applauds the Department for its forward-thinking and timely suggestion to make review its ICT Procurement processes, and we append our response to the consultation paper to this letter.

We would be happy to convene further discussions between our members and the Department to discuss the issues further, as well as other matters pertaining to technology use and outsourcing further, and look forward to engaging with you on this matter.

Yours sincerely,

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³ https://www.asd.gov.au/infosec/irap/certified_clouds.htm