

6 April 2020

Dear Gateway Operators,

As we move past the phase of emergency response and settle into this phase of pandemic management, it is critical we continue to focus on protecting the integrity, security and availability of the STN, an essential part of the super ecosystem. To that end, GNGB would like to highlight the following:

- GNGB expectations in dealing with heightened risks presented by the COVID-19 pandemic
- Deferring non-essential change
- Essential changes underway
- STN ISR conformance activity for 2020
- Gateway Operator fees

### Heightened Risk Areas

As businesses are reshaped to ensure employee safety and continuation of services, GNGB expects Gateways to continue to operate within the controls set out in the Gateway Standards and Information Security Requirements. The pandemic, updated legislation and increased malicious cyber activity mean securing access to the Gateway and ensuring integrity of data within your control is more important than ever. GNGB expects each of our Gateways to take steps to manage this heightened risk. Provisions exist for emergency patching and outage windows within the Gateway Standards to ensure any vulnerabilities can be addressed quickly and effectively. Please be mindful of the obligation to notify GNGB and STN participants of any plans to do this. In addition, it is critical that day to day management of issues as a network is streamlined, so escalate issues quickly.

### Reviewing Non-Essential Change

To ensure continued focus on core stability of the STN, GNGB is reviewing all non-essential change within our roadmap to limit impact to Gateways and the STN during this time. Updates will follow on the status of individual initiatives. GNGB expects that Gateway Operators will also review all drivers for non-essential change carefully, to minimise risk of impact to the STN.

A reminder also, as we approach April 28 peak industry period, that the STN has a regular change freeze one week prior to this date. This period is of particular note this year, as Funds will also be managing early access to super applications.

### Essential Change and associated regulatory compliance deadlines

Whilst we seek to limit change, we recognise the below impending activity:

#### USM April Deadlines

Whilst you will have seen the deferral of USM reporting and payments from April to October 31, it is essential to work with your Fund clients to understand if they will make use of the relief, as it does include provision for Funds to proceed if they deem it necessary. The ATO is not expecting a large number of Funds to continue with this process in April.

#### Early Access to Super

The process by which these transactions will occur is now agreed, and does not directly impact Gateways or the STN. GNGB expects Gateways will provide support where required to their Fund clients as they deal with the potentially significant impacts of this policy change. Some Funds are opting to provide MATS reporting out of normal cycles, to ensure up to date member balances being reported via the MyGov website. Whilst this is not via the STN, Gateways that provide these services to their Funds will need to consider this.

#### Rollovers v 3.0

The current advice is that the ATO solutions and EVTE environment will be available as expected in Q4 2020 and it is unlikely any change to the compliance date of 31 March will be sought, however options for an extended transition period are being reviewed. It is likely, therefore, that Gateways will

be required to be ready to receive SMSF rollovers at the very least, by 31 March 2021. Working with Funds and SMSF end points to understand their timing of compliance here will be essential. Interoperability testing schedule is still planned for October/November 2020 however GNGB will continue to provide guidance on this over the following months as industry dates are firmed up.

#### STN ISR Audits and Attestations

There is **no change to dates** for Gateway Conformance Activity for 2020. Gateways are required to submit audits by December 31, 2020 (inclusive of demonstrated ISO 27001 compliance) and attestations by January 31 2021. Two points to make:

- We are undertaking essential changes to the ISR and possibly the Gateway Standards in line with our originally scheduled review. However, in the context of the current situation, these changes will be limited to material gaps and high risk areas identified, as well as providing clarity around existing control descriptions, reduction of ambiguity and duplication. Our principle of limiting non-essential changes will be applied here. We expect any changes to be finalised by June 30 2020 to enable Gateway readiness for audits to occur.
- GNGB acknowledges the challenges that may be involved in facilitating audits remotely, whilst social distancing measures are in place. We encourage Gateways to think objectively about how these challenges can be overcome and start planning early. If Gateways are having difficulty demonstrating specific controls to their auditors' satisfaction and this can be attributed directly to the COVID-19 situation, GNGB will consider submissions to this effect on a case by case basis, provided we are notified prior to conformance deadlines.

#### Gateway Governance Fees

Invoices are due to be sent out later this month for the annual Gateway Operators fees, with payments due in June 2020. This process will proceed and you can expect to receive these as normal. In the context of the current environment, GNGB will consider applications by Gateway Operators experiencing difficulties, to defer payment of annual fees for a period of up to 6 months. Please advise if you wish to make an application in relation to this.

Should you have any questions or concerns regarding any of the points outlined, do not hesitate to contact GNGB for a confidential discussion.

Kind Regards



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