



Australian Information Industry Association

Submission on the

Suitability Assessment Framework for Coordinated Contracting Arrangements

About the AIIA

The Australian Information Industry Association (AIIA) is the nation's peak body for those in the digital ecosystem, leading strategic policy and advocacy to shape a thriving digital sector. Through strong engagement with government, industry, and the broader community, the AIIA ensures the voice of its members informs decision-making on technology, innovation, and digital capability.

Membership provides direct access to influential networks, premium events, and opportunities to collaborate on initiatives with the sector's best and brightest to drive industry growth, improve productivity, and secure Australia's place as a global technology leader. AIIA members access real collaboration, real connections, and real outcomes.

Introduction

The AIIA welcomes the opportunity to provide feedback on the suitability assessment framework for coordinated contracting arrangements. We support the objectives behind the framework, such as securing better value for money from the Commonwealth's buying power, improving transparency in whole-of-government digital procurement, and strengthening the Australian technology sector.

This submission focuses on a small number of process and operating matters that the discussion paper does not yet address. We raise them so that the framework is workable, fair and durable across the diversity of sellers that supply government.

How sellers are assessed and selected

1. How the criteria will be applied is not yet defined

The paper sets out the elements it intends to assess, grouped as commercial relationship elements and strategic partnership elements, and seeks input on the variables that should inform them. It does not, however, indicate how those elements will combine into a decision. It is not stated whether the criteria will operate as pass or fail hurdles, as a weighted assessment, or as guidance applied at the DTA's discretion. As a result, it is unclear whether falling short on a single element would disqualify a seller or would simply weaken their overall case.

Recommendation: As the criteria are developed, the DTA should define and publish the decision architecture, including which elements act as gating thresholds, which are weighted considerations, and the bounds of any discretion. We are not seeking a fixed numerical rubric, which we accept must remain context-specific, but transparency about how decisions are reached so that sellers can understand and engage with the process.

2. No review mechanism is proposed

The paper does not describe any process by which a seller could receive reasons for, or seek review of, a suitability decision. Because suitability determines whether a seller can hold a CCA, these decisions carry real commercial consequences.

Recommendation: The framework should include a defined, reviewable process under which sellers are given reasons for a suitability decision and a clear path to seek review. As this is an eligibility matter rather than an approach to market, the usual tender-complaint pathways may not apply, which is why a purpose-built mechanism is warranted as a matter of good governance.

3. It is unclear whether a supplier can decline to enter a CCA

The paper is written from the perspective of the DTA assessing whether a seller is eligible. It does not state whether meeting the threshold obliges a seller to enter a CCA, or whether participation remains a choice for the seller. It is also unclear how a seller's eligibility status, or participation, interacts with their continued ability to sell through competitive panels and directly to individual agencies.

Recommendation: The framework should confirm that meeting the eligibility threshold does not compel a supplier to enter a CCA, and should clarify how eligibility and participation interact with a supplier's other routes to market, so that coordinated arrangements complement rather than displace competitive supply.

How a CCA operates

4. Compliance obligations are extensive and open-ended

Question 2 indicates that CCA sellers must meet the full suite of Commonwealth policy positions and accept the government's terms and conditions *as updated from time to time* over the life of the arrangement. The policy set is substantial, spanning the Commonwealth Supplier Code of Conduct, modern slavery, cybersecurity frameworks and the Procurement Connected Policies, among others. The paper does not indicate that obligations would be proportionate to contract size or risk, nor that existing certifications would be recognised.

The AIIA supports these policy objectives. We raise three practical concerns about workability. Open-ended obligations that can change after a contract is signed are difficult to price and tend to be priced in as risk, which can raise costs for government. A uniform obligation set bears far more heavily on smaller sellers, and flows down the supply chain to the partners and resellers who fulfil much of this work and who have less capacity to absorb it. And requiring fresh assessment where a seller already holds equivalent certification adds cost without adding assurance.

Recommendation: Obligations should be transparent and proportionate to contract size and risk; subject to reasonable change control and transition periods, with materiality thresholds, when policies are updated during the life of a CCA; and

structured to recognise equivalent existing certifications and assurance, for example current IRAP assessments and Hosting Certification Framework status, to avoid duplication.

5. Negotiation should not stall existing procurement or service delivery

A significant practical concern, drawn from our members' experience of previous single seller arrangement negotiations, is the length of time these can take to conclude. While negotiations remain unresolved, in-train agency procurements and existing business can effectively be placed on hold, and the consequences of that pause are considerable. Agencies have at times been left unable to deliver services and projects that depend on the arrangement, which carries a real cost to government and the community it serves. Just as importantly, an enforced freeze on existing business risks becoming a source of leverage in the negotiation itself, since one party continues to bear the cost of delay while terms are settled. That dynamic sits uncomfortably with the balanced, value-for-money outcome the framework is intended to deliver.

Recommendation: The framework should provide a defined, time-bound negotiation pathway, and a transitional arrangement under which in-train and existing agency procurements may continue until a CCA is concluded. This protects continuity of service delivery and helps ensure the negotiation is not distorted by an enforced hiatus on existing business.