



Learn about tax and the ATO

Learn more about how we support key tax-paying populations and access educational resources for students.

Education zone

Education zone provides resources to help teach tax and superannuation in primary and secondary school.

Tax and Corporate Australia

Review information on the income tax compliance of large corporate groups for the 2023–24 year.

Tax and small business

We measure small business income tax performance, estimate their income tax gap and use research to reduce the tax gap.

Community education

We provide free tax and superannuation education for community groups Australia-wide.

Essentials for strengthening your small business

Essentials to strengthen your small business is a new online learning tool to improve your business knowledge.

Our three-tier model



Our three-tier model helps us understand key behaviours driving tax performance for PMBs.

QC 100192

Community education

We provide free tax and superannuation education for community groups Australia-wide.

Published 6 January 2026

What we offer

We provide free education to help people understand tax and super.

Our sessions are designed specifically for community organisations and depending on your location, they can be delivered face-to-face or online. These sessions help participants understand their rights and obligations under the tax and super systems. We may also attend community events and expos to offer support and answer questions.

We help people who are new to Australia's tax and super systems, and those who need extra support, including:

- people from different cultural and language backgrounds
- Aboriginal and Torres Strait Islander peoples.

Our presentations

Our free education sessions can be tailored to audiences needs and includes times for questions afterwards. We currently offer the following free presentations:

- [Tax in Australia](#)
- [Scam alerts](#)
- [Starting a new job](#)
- [Superannuation basics](#)
- [Tax time \(July to October\)](#)

Tax in Australia

Learn about Australia's tax and super systems. This presentation is designed for new migrants, refugees, and culturally and linguistically diverse communities.

Scam alerts

Discover how to protect yourself against scams, fraudulent emails, calls and text messages.

Starting a new job

Understand the essentials of tax and super when beginning a new job, including what forms to complete and how to manage your obligations.

Superannuation basics

Learn how superannuation works and why it's important for your long-term financial security.

Tax time

Prepare for tax time with key updates, tips for lodging a tax return, and advice on meeting your obligations.

Contact us to request free education

To request free tax and super education or invite us to attend a community event, email CommunityEducation@ato.gov.au.

Essentials for strengthening your small business

Essentials to strengthen your small business is a new online learning tool to improve your business knowledge.


Published 20 May 2024

Essentials to strengthen your small business is a flexible and free online learning resource for small businesses, educators and tax professionals to share and use with their staff, students and clients.

The range of courses are designed to help build financial and business literacy among small businesses so they are able to thrive and meet their tax and super obligations.

To find out more, [take a tour of the site](#) .

Webinar recordings

For webinar recordings on a range of topics, visit our [atoTV webinar channel](#) .

Small business masterclasses

Learn how to run your small business with our masterclass series.

QC 102070

Small business masterclasses

Learn how to run your small business with our masterclass series.

Last updated 18 May 2026

About our small business masterclasses

Build confidence in managing your small business obligations with our interactive masterclasses. Designed to complement our free online courses, these sessions give you direct access to experienced ATO staff who can help clarify your responsibilities, walk through real-world scenarios, and provide practical guidance.

Masterclasses cover topics such as:



- registration
- invoicing
- record-keeping
- reporting requirements
- strategies for maintaining healthy cash flow.














They're a practical way to strengthen your understanding of day-to-day business operations, helping you build good habits early and avoid common pitfalls that can affect your small business.




Whether you're starting out or already running an established business, these sessions are designed to help you build confidence and stay on track throughout the year – not just at tax time.

Register for our upcoming masterclasses


How to register for our one-hour masterclasses

Topic	Registration link for date and time (AEST)
Starting a small business	<ul style="list-style-type: none">• 19 May 2026 – 12:00 pm Register here • 20 May 2026 – 12:00 pm Register here • 22 May 2026 – 12:00 pm

	Register here 
Record keeping	<ul style="list-style-type: none"> • 27 May 2026 – 12:00 pm Register here  • 28 May 2026 – 12:00 pm Register here  • 29 May 2026 – 12:00 pm Register here 
Cash flow for small business success	<ul style="list-style-type: none"> • 2 June 2026 – 12:00 pm Register here  • 3 June 2026 – 12:00 pm Register here  • 4 June 2026 – 12:00 pm Register here 
Claiming home-based business tax deductions	<ul style="list-style-type: none"> • 9 June 2026 – 12:00 pm Register here  • 10 June 2026 – 1:00 pm Register here  • 11 June 2026 – 12:00 pm Register here 
Claiming small business tax deductions	<ul style="list-style-type: none"> • 16 June 2026 – 12:00 pm Register here  • 17 June 2026 – 12:00 pm Register here  • 18 June 2026 – 12:00 pm Register here 


<p>Tax time essentials: How to successfully report, pay & lodge correctly</p>	<ul style="list-style-type: none">• 23 June 2026 – 12:00 pm Register here • 24 June 2026 – 12:00 pm Register here • 25 June 2026 – 12:00 pm Register here 
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Can't join – explore your options

If you're unable to attend the masterclass sessions, '[Essentials to strengthen your small business](#) 

Essentials lets you explore topics that matter most to you – whether that's understanding your day-to-day obligations, improving how you manage money, or setting up good systems and habits that make running your business easier.

You can start with a single course, browse by business stage or industry, or simply pick the areas you want to feel more confident in. With flexible, bite-sized learning, you can dip in between busy periods, return to your progress at any time, and build knowledge at your own pace while you wait for your next live learning opportunity.

Explore Essentials today at <https://smallbusiness.taxsuperandyou.gov.au> .

QC 102985

Our three-tier model

Our three-tier model helps us understand key behaviours driving tax performance for PMBs.

Published 2 October 2025

We use the three-tier model (3TM) for public and multinational businesses to:

- understand what behaviours drive tax performance and non-performance across the market and how they impact the **large corporate tax gap**
- support us in making strategic decisions on what areas to focus on, including through **population-wide approaches**, to address risks and continue to support high levels of tax compliance by large corporates.

The model provides a holistic view of the tax and super systems in operation. Our focus is on:

- supporting taxpayers in meeting their obligations
- proactively monitoring and engaging with the market to
 - maintain high levels of compliance
 - prevent any deterioration in tax performance.

The model focuses on taxpayer behaviours, to help us understand which:

- behaviours are more likely to contribute to increased tax performance
- areas need more focus to ensure they are within check.

Public and multinational business three-tier model



Our model for PMB entities helps us understand the tax system in operation and guide our areas of focus for compliance.

QC 105556

Public and multinational business three-tier model

Our model for PMB entities helps us understand the tax system in operation and guide our areas of focus for compliance.

Last updated 7 November 2025

The 5 pillars of compliance

We monitor the level of willing participation in the tax system through the OECD's 4 pillars of tax compliance.

The three-tier model (3TM) is comprehensive and leverages the pillars of compliance to consider all areas of tax performance and the tax and super laws. This means that the model covers the different ways taxpayers interact with the tax and super systems.

Increasingly we are also focussing on third-party reporting as a 'fifth pillar' in its own right. Third-party reporting is reporting on the tax affairs of others. The modern tax system is increasingly relying on third-party data provided by large corporate groups. This has flow-on impacts for taxpayers of all sizes and how they interact with their tax obligations.

Taxpayer behaviours identified in the model are generally linked to one of the pillars of compliance:

1. **Registration:** Are taxpayers correctly registered in the tax system?
2. **Lodgment:** Are taxpayers lodging their forms on time?
3. **Correct reporting:** Are taxpayers providing the right information in their forms?
4. **Payment:** Are taxpayers paying their obligations on time?
5. **Third party reporting:** Are taxpayers providing accurate and timely data for the ATO?

The 3 tiers and what they tell us

The model is made up of 3 tiers that drill down into the behaviours we observe for public and multinational business:

- **Tier 1:** These are the **major drivers** of tax performance and non-performance for these taxpayers. These behaviours are what drives improvement or deterioration in the tax gap.
- **Tier 2:** These are the **visible events** for Tier 1 behaviours. They can impact on us achieving improvements in tax performance or preventing deterioration in the system.
- **Tier 3:** These are the **specific focus areas** for each Tier 2 event. This is where we intervene to address the behaviours.

How we use the 3TM in our decision making

By giving us a holistic view of taxpayer behaviours, the model:

- helps us focus on strategies that will help manage **key compliance risks for large corporate groups**
- supports us to reach our goal of reducing the **large corporate tax gap** and understand whether public and multinational businesses are meeting their tax obligations.

The model allows us to provide transparency on where we are focussing our efforts to:

- foster strong tax performance
- prevent and address tax non-performance by public and multinational business.

How taxpayers can use the 3TM

Our **justified trust** assurance programs focus on assuring that the largest public and multinational businesses have paid the right amount of tax. These programs provide an important foundation for our levels of confidence about tax compliance across the various behaviours addressed by the 3TM.

Public and multinational businesses can use the model to consider their performance in the tax and super systems. Through improved understanding of our views on observed behaviours, taxpayers can:

- gain insight into our focus areas and be prepared
- address any potential areas of non-performance early.

Owing to wide ranging differences in business activities, models and structures, not all focus areas in the model will apply to every taxpayer. However, the model can help taxpayers understand where we are likely to direct our attention and at what intensity.

Whilst the 3TM covers the key drivers of tax performance there may be times where non-compliance is detected but is not covered by the model. We may choose to investigate the matter even though the matter is not currently reflected in the model.

The PMB three-tier model

For public and multinational businesses, we've identified 5 **behaviours** driving tax performance:

- [International related party dealings](#)
- [Cross-border investment structures](#)
- [Domestic tax positions and structures](#)
- [Administrative compliance obligations](#)
- [Actions that support tax compliance](#)

These behaviours are Tier 1 of the three-tier model. The following tables outline the **events** (Tier 2) and **focus areas** (Tier 3) for each behaviour.

You can also download a copy of our [PMB three-tier model \(PDF, 112KB\)](#). [📄](#)

International related party dealings (Tier 1)

These events and focus areas typically relate to the 'correct reporting' pillar of compliance. Under this Tier 1 behaviour, we consider arrangements and dealings between international related parties that could have an impact on tax positions under Australian income tax law.

Events and focus areas for international related party dealings

Events (Tier 2)	Focus areas (Tier 3)
Transfer pricing and arm's length conditions	<ul style="list-style-type: none"> • Offshore hubs and commodity pricing • Inbound supply chain distribution arrangements • Transfer pricing mischaracterisation • Financing arrangements • Insurance and reinsurance
Intangibles arrangements	<ul style="list-style-type: none"> • Intangibles migration arrangements (including mischaracterisation of Australian activities connected with intangibles) • Characterisation of royalty payments

Cross-border investment structures (Tier 1)

These events and focus areas typically relate to the 'correct reporting' pillar of compliance. Under this Tier 1 behaviour, we consider arrangements and business structures that cross more than one jurisdiction and the impacts under Australian income tax law.

Events and focus areas for cross-border investment structures

Events (Tier 2)	Focus areas (Tier 3)
Debt and capital structures	<ul style="list-style-type: none"> • Pricing and quantum of debt • Debt creation, loading and dumping • Interest withholding tax • Characterisation of debt and equity • Third-party debt test

	<ul style="list-style-type: none"> • Restructuring in response to thin capitalisation rules
Disposal of assets or businesses by foreign residents	<ul style="list-style-type: none"> • Characterisation of disposals • Non-resident tax exemptions • Multiple entry consolidated (MEC) groups and capital gains tax (CGT) consequences
Structuring through vehicles or arrangements	<ul style="list-style-type: none"> • Accessing managed investment trust (MIT) concessions • Inversion or top-hatting arrangements or imposition of partnerships or other entities • Accessing treaty benefits • Recognising costs through recharges or risk shifting • Synthetic equity arrangements
Income recognition from business operations	<ul style="list-style-type: none"> • Attribution of profits through controlled foreign companies (CFCs) • Application of CFC regime • Attribution of permanent establishment profits
Hybrid arrangements	<ul style="list-style-type: none"> • Importation of offshore hybrid mismatches • Offshore hybrid mismatches
Global tax arbitrage	<ul style="list-style-type: none"> • Top-up tax requirements

Domestic tax positions and structures (Tier 1)

These events and focus areas typically relate to the 'correct reporting' pillar of compliance. Under this Tier 1 behaviour, we consider how Australian income tax law is interpreted and applied by businesses.

Events and focus areas for domestic tax positions and structures

Events (Tier 2)	Focus areas (Tier 3)
Characterisation of business activities	<ul style="list-style-type: none"> • Treatment of capital and revenue • Business fragmentation
Treatment of distributions	<ul style="list-style-type: none"> • Claiming or accessing franking credits • Allocation of franking credits • Application of scheme provisions to corporate distribution
Claiming other tax concessions or rates	<ul style="list-style-type: none"> • Entitlement to research and development (R&D) tax offsets • Entitlement to base rate entity tax rate • Entitlement to section 128F withholding tax exemption • Eligibility for MIT status • Foreign government investment • Cost or expense recharge or push down
Creation and use of carried forward losses	<ul style="list-style-type: none"> • Application of the business continuity test • Use of revenue losses • Use of capital losses
Disposal of wholly domestic business structures	<ul style="list-style-type: none"> • CGT rollovers • Allocable cost amount (ACA) calculations • Contingent consideration arrangements
Treatment and reporting for goods and services tax	<ul style="list-style-type: none"> • Treatment of significant or unusual transactions involving financial supplies

(GST) purposes	<p>(e.g. financial acquisition threshold)</p> <ul style="list-style-type: none"> • Treatment applied by financial services, investment and insurance industries (e.g. GST apportionment, reduced input tax credits, reverse charge) • GST classification of food and health products • Reporting of GST on low value imported goods and inbound intangibles supplies by offshore entities • Treatment applied to real property transactions and accommodation • Entitlement to GST refunds due to retrospective change in treatment
Treatment and reporting for Petroleum resource rent tax (PRRT) purposes	<ul style="list-style-type: none"> • PRRT deductions • PRRT assessable receipts • Transferred exploration expenditure • PRRT avoidance arrangements • Closing down expenditure

Administrative compliance obligations (Tier 1)

Under this Tier 1 behaviour, we consider the various administrative obligations of public and multinational businesses for registration, lodgment, payment, and third-party reporting.

Events and focus areas for administrative compliance obligations

Events (Tier 2)	Focus areas (Tier 3)
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Foreign and multinational reporting	<ul style="list-style-type: none"> • Lodgment of ATO general purpose financial statements (GPFS) • Lodgment of country-by-country (CBC) reports • Public CBC reporting • Lodgment of Global Anti-Base Erosion (GloBE) and domestic minimum tax returns
Registration obligations	<ul style="list-style-type: none"> • Permanent establishment registrations • Offshore entities making supplies of low value imported goods and inbound intangibles to Australian consumers
Reporting obligations	<ul style="list-style-type: none"> • Financial institution data – Common reporting standards (CRS) and Annual investment income reports (AIIRs) • Investment body data – AIIRs and Attributed MIT (AMIT) member annual statements • Taxable payments annual reporting (TPAR) system obligations • Large Australian Prudential Regulation Authority (APRA) fund member reporting obligations • Lifestyle assets data • Health insurance data
Lodgment obligations	<ul style="list-style-type: none"> • Lodgment of tax returns • Lodgment of activity statements • Lodgment and correct completion of annual return schedules • Lodgment and correct completion of supplementary annual GST return • Non-resident withhold reporting obligations

	<ul style="list-style-type: none"> • Significant global entity (SGE) self-assessment
Payment obligations	<ul style="list-style-type: none"> • On-time payment of income tax (including instalments) • On-time payment of GST • Large fund payment standards
Employer and other indirect tax obligations	<ul style="list-style-type: none"> • Fringe benefits tax (FBT) obligations • Employer superannuation guarantee (SG) obligations • Pay-as-you-go (PAYG) withholding obligations • Luxury car tax (LCT) obligations • Excise obligations • Fuel tax credit (FTC) obligations

Actions that support tax compliance (Tier 1)

These events and focus areas typically relate to other actions taxpayers may take to support tax compliance.

Events and focus areas for actions that support tax compliance

Events (Tier 2)	Focus areas (Tier 3)
GST governance, systems and controls	<ul style="list-style-type: none"> • Effective systems and controls ensure accurate GST reporting and issuance of invoices
Governance	<ul style="list-style-type: none"> • Operational effectiveness of governance processes • Governance over third-party data
Reliance on tax advice	<ul style="list-style-type: none"> • Promoter penalties • Marketing of high-risk GST arrangements

Engagement with regulator	<ul style="list-style-type: none">• Making true and accurate statements• Providing full information• Adhering to due dates for information requests• Privilege and concession claims• Satisfying Foreign Investment Review Board (FIRB) conditions
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QC 105557

Our commitment to you

We are committed to providing you with accurate, consistent and clear information to help you understand your rights and entitlements and meet your obligations.

If you follow our information and it turns out to be incorrect, or it is misleading and you make a mistake as a result, we will take that into account when determining what action, if any, we should take.

Some of the information on this website applies to a specific financial year. This is clearly marked. Make sure you have the information for the right year before making decisions based on that information.

If you feel that our information does not fully cover your circumstances, or you are unsure how it applies to you, contact us or seek professional advice.

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