

15 December 2020

Digital Transformation Agency

PO Box 457
Canberra City
ACT 2601

via email only to: digitalidentity@dtg.gov.au

Dear Sir / Madam,

RE: Digital Identity Legislation

Communications Alliance welcomes the opportunity to provide feedback in response to the Digital Transformation Agency (DTA) Digital Identity Legislation Background and Consultation Papers.

Our members welcome any efforts aimed at contributing to voluntary enhanced security mechanisms in relation to identity establishment, verification and management. In fact, our members in the telecommunications sector already undertake substantial digital and non-digital identity verification/management for consumers of communications services, either against the background of legislative and regulatory requirements and/or as part of their own processes, designed to minimise fraud and to ensure that existing verified identities are managed securely.

It is, therefore, critical that the proposed legal digital identity framework (DI Framework) remains voluntary for industry and does not create two parallel mandatory sets of requirements. With a view to the future uptake of such a voluntary framework, it will be important to harmonise the requirements of the DI Framework with existing requirements of the various sectors as well as other overarching legislation such as the *Privacy Act 1988* to allow and incentivise future participants to join the DI Framework with ease and without unnecessary expenditure.

In this context, it will be equally critical to ensure that any new (or existing but enhanced/formalised) DI Framework is technology-neutral and platform-agnostic, as well as principles-based to the largest extent possible, to cater for the immense variety of sectoral and technological approaches to identity verification and management.

Trust in the expanded framework by users will be key to its success. In this respect, we highlight the importance of a governance and oversight body that is truly independent – and, importantly, is also perceived to be independent. For this reason, we would recommend this body ought not be hosted within, be affiliated with or be within the reach of what may be perceived to be informal directions from a Government Department or security organisation.

We look forward to further engaging with your organisation and all relevant stakeholders in this important process, to create an effective and efficient expanded voluntary digital identity framework for Australia.

If you have any questions or wish to discuss, please contact Christiane Gillespie-Jones (c.gillespiejones@commsalliance.com.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Stanton'. The signature is fluid and cursive, with a large initial 'J'.

John Stanton
Chief Executive Officer
Communications Alliance