

14 July 2021

Digital Transformation Agency  
Digital Identity Legislation  
PO Box 457  
Canberra City ACT 2601

*via email: [digitalidentity@dta.gov.au](mailto:digitalidentity@dta.gov.au)*

Dear Sir/Madam

**Digital Identity Legislation Position Paper**

We welcome the intent of the Digital Identity legislation seeking to provide a system that is simple, safe and secure while allowing small businesses to voluntarily engage with Government services and verify their presence online. The legislation provides a path to digitisation and also enables a nationwide cyber-security uplift, however care must be taken to ensure the expansion to accredit more entities does not transform the system into a barrier to access for small business users. We provide the following comments regarding the legislation:

1. We support the principle of interoperability within the Digital Identity framework, however the process must be seamless for time poor small business users. Failure to ensure seamlessness will create barriers to uptake and limit the benefits of digitisation and cyber security uplift.
2. The Digital Identity system needs to be designed as an 'enter once, use many' option, with appropriate care taken to ensure that users are not made to repeatedly enter proof of identity details for multiple service providers. This will increase small business' utilisation of the tool.
3. Small businesses should be considered in the charge setting structure within the proposed late 2021 consultation regarding the setting of user charges. The current position paper provides no clear detail on charges but indicates the legislation will not cover the charges passed on to users by relying parties. This lack of clarity has the potential to increase costs for small businesses if charges are passed on by the proposed relying parties, ie. Federal government, state and territory governments, local government, banking and utility providers.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Mr Rowen Murphy on 02 6213 7448 or at [Rowen.Murphy@asbfeo.gov.au](mailto:Rowen.Murphy@asbfeo.gov.au).

Yours sincerely



**The Hon. Bruce Billson**  
Australian Small Business and Family Enterprise Ombudsman