

1account comment on the Australian Government Digital Identity Legislation Position Paper

1account is a UK based international and innovative digital identity and age-verification company with a mission to better provide access to goods and services, especially for that demographic which does not have access to traditional forms of identity such as passports or driving licenses, and to better protect children by restricting access to age-inappropriate goods and services both online and offline.

1account is currently operating in the age-restricted products sectors and is supportive of UK Government and international measures to increase the acceptability of digital identity products and to remove legislative and regulatory barriers for the kind of digital wallets that we believe communities will one day soon take for granted.

Just as 1account welcomes the UK government's Digital Identity and Attributes Trust Framework, and works directly with the UK's Department for Digital, Culture, Media and Sport on its development, 1account supports the Australian government in its intention to legislate for a Trusted Digital Identity Framework. We welcome this approach to ensure the necessarily high standards required to support providers of digital identities, to ensure users of those identities can trust the attributes they carry and share, and to protect holders of digital identities and foster the high level of trust which is fundamental.

1accounts suite of products helps retailers prevent unlawful access to alcohol, knives, vaping and tobacco products as well as online services such as gambling or adult content online and on the high street within the UK and internationally.

Our consumer digital identity app complements our existing online verification technology which cross references consumers' information against data sources that enable it to validate its authenticity, such as a user's mobile phone network.

1account's online validation platform has seen validation success ratios exceed 95%, rapidly expanding the company's reputation across a range of age restricted sectors, such as vaping and gambling.

1account welcomes the opportunity to comment on Australia's digital identity legislation in a constructive spirit and would be more than happy to elaborate on our points as the Government moves forward.

With regard to section 5.4.11, Principle of Interoperability, 1account is a strong believer in interoperability and strongly supports the principle. However, we believe this should not be based on a single mandated technical specification which risks shackling innovation, consumer usability, commercial value and best practice. It is also the likeliest approach to become outdated in a short time. We know that interoperability is a core requirement to ensure that a digital identity meets its full potential for the consumer who has invested their trust in a digital

identity product. And that without that trust and uptake industries will not realise the full benefits of digital identity both on and offline.

Should there be set technical specifications on interoperability or no set specifications at all? In the sense that recommending specific technical specifications risks becoming a de facto mandating of specifications by driving industry to a single dominant solution, there is value in leaving this open to industry to drive so long as principles are met. 1account has developed interoperable technology and is making that available to anyone who wants to use it. So in order to better ensure that best practice and new technologies are not stifled, detrimental to users, 1account believes that standards should be open and compatible rather than mandated and that industry should choose which standards, overseen and approved by a regulator – the Oversight Authority – to integrate or not. So, rather than limiting interoperability as competing and potentially incompatible standards seek to dominate and become mandated, commercial drivers can determine those standards which will be taken up. Monopolising this approach around a single technology is also potentially damaging to innovation, best practice, security and data protection, and it arguably risks complacency.

With regard to 7.4, Privacy and consumer safeguards, 1account is clear on the importance of consumer safeguards, security and protections against fraud. It cannot be understated. Ultimately, the whole value of digital identity hinges on privacy, security, and the prevention of fraud. One only needs to imagine a scenario in which an accredited identity provider is breached and identities compromised to appreciate the damage this would do to consumer trust and uptake and for commercial value and buy-in.

As an identity provider already operating we know that trust in our service is at the heart of what we do. A single fraudulent identity would compromise trust in 1account. So, while we value and work hard on the ease of the user journey, this can never compromise the importance of absolute confidence in the validity of the identity which is created and the security measures we use to protect that identity.

We know that there are a number of ways to protect data and believe this should be an evolving process rather than a question of establishing set requirements that may not keep pace with technological improvements. What should be considered fundamental is that a breach of data protections does not expose the whole of an individual identity in a decipherable form. Counter fraud and security measures can provide the necessary protections. Stipulating controls without adaptability and agility, and without close working with industry, may undermine data and privacy protecting objectives. Ultimately this responsibility will fall on the regulator. But instituting a need to work with industry will best protect all parties.

On privacy more specifically, with reference to 7.4.7 and the requirement to conduct a Privacy Impact Assessment, 1account supports this approach. As stated, 1account knows that trust, security and protecting privacy are key requirements of digital identity. It is important that protections that are maintained, which 1account already affords, are not diluted by an arguably more democratised approach to digital identity. So we support the strong governance approach. Any inadvertent relaxing of obligations, in order to better promote the

uptake of digital identities, whether by design or by a failure of regulation, would be harmful to the interests of all users.

With regard to 11.2, 1account joins those stakeholders keen to see more on the charging approach and model. We strongly agree with the first principle at 11.4.2.1 that charges should foster inclusion and facilitate affordability for users.

In the sense that exclusion would fundamentally undermine trust and value in a digital identity, inclusion is a key requirement which 1account believes should be a prominent consideration. Any individual has (or should have) a choice whether to create a digital identity or not. Choice may mean that some demographics are underrepresented in holding digital identities. However, if some demographics are underrepresented not through choice but through an inability of industry to cater to them, that undermines the value of digital identities.

Inclusion is central to 1account's approach. We strongly believe in helping and advocating for those who do not have, for whatever reason, though often socio-economic, photographic identity documents and developing services to ensure they are still able to create and hold a digital identity in order to freely access goods and services which they might want and which they are entitled to. We strongly support efforts to address this. In the UK, 1account works closely with the PASS scheme to achieve wider availability of accepted proof of identity and the digitising of this in particular.

With regard to 11.4.3, the selection of service providers to the system, 1account would also like to see more detail of what this selection process might look like. But we trust that its objective would be welcoming of any identity provider that meets the established requirements for accreditation and that it would guard against, what one would expect would be inadvertent, any restriction on competition.

1account looks forward to contributing further as the legislation develops. We are more than happy to be contacted to further discuss any of the points we've made.