

26 October 2018

National Arrangements for the Protection and Management of Identity Information
C/o Home Affairs
4-6 Chan St
BELCONNEN ACT 2613

Via email: submissions@homeaffairs.gov.au

Dear Sir or Madam

Review of national arrangements for the protection and management of identity information

Chartered Accountants Australia and New Zealand welcomes the opportunity to make a submission to the Department of Home Affairs on matters covered in the Terms of Reference of the Review of national arrangements for the protection and management of identify information. Appendix A provides more information about Chartered Accountants Australia and New Zealand.

Objectives and purpose:

We note that one of the Terms of Reference is to respect and promote peoples' privacy with a scope to focus primarily on information most commonly relied upon as evidence of a person's identity by government and key sectors of the economy. We consider that the provision of clear messaging, which outlines the purpose, use and sharing of identity information collected, will be important.

We further note that in the 2007 *Report to the Council of Australian Governments on the elements of the National Identity Security Strategy* ("NIS strategy report") clear objectives and clear purpose are outlined. For example, the national document verification service (DVS) will enhance the integrity of agencies' proof of identity (POI) procedures by providing assurance that a person is establishing eligibility with verifiable documents.

Private sector:

We note that the objectives in the terms of reference do not appear to distinguish between government and private protection and management of identity information. However, the three points listed for consideration appear to focus only on government mechanisms. We suggest that consideration is also given to the private sector protection and management of identity information. We consider it likely that the private sector will use similar identity information to government and it is important that this forms part of the review.

Education:

A critical aspect to protect Australians from the theft or misuse of their identity information will be greater awareness and education of the possible risks and how to protect themselves. It will also be important to make individuals aware of steps to take and the support available to them should they become victims of identity crime. Individuals will need to be able to decide whether it is appropriate for them to share certain identity information with third parties. Chartered Accountants, as trusted advisors, can play a role in helping to communicate these messages with their clients.

Retention of Data:

We recommend that careful consideration be given to the retention of data. For example, access to information post-verification may be required to determine the accuracy of that information (i.e. audit of the system) or potential issues may arise where a re-check of data is required for certain individuals. In particular, the length of time that data is retained will need to balance potential post-verification obligations with individual information security.

Privacy Laws:

We note that the handling of personal information about individuals is regulated by the Privacy Act 1988. It will be critical for the use, retention and sharing of personal identity information, considered under this review and incorporated into a future iteration of the NIS Strategy, to be handled in accordance with this Act. We acknowledge that finding the right balance between privacy, protection of personal information and managing community expectations will be challenging particularly when developing verification areas such as biometrics.

We look forward to the opportunity to provide further input as the review progresses. Should you have any queries concerning the matters discussed above or wish to discuss them in further detail, please contact Karen McWilliams via email at karen.mcwilliams@charteredaccountantsanz.com or phone (612) 8078 5451.

Yours faithfully,



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Advocacy & Professional Standing
Chartered Accountants Australia and
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Karen McWilliams FCA
Business Reform Leader
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Appendix A

About Chartered Accountants Australia and New Zealand

Chartered Accountants Australia and New Zealand is a professional body comprised of over 120,000 diverse, talented and financially astute members who utilise their skills every day to make a difference for businesses the world over.

Members are known for their professional integrity, principled judgment, financial discipline and a forward-looking approach to business which contributes to the prosperity of our nations.

We focus on the education and lifelong learning of our members, and engage in advocacy and thought leadership in areas of public interest that impact the economy and domestic and international markets. We are a member of the International Federation of Accountants, and are connected globally through the 800,000-strong Global Accounting Alliance and Chartered Accountants Worldwide which brings together leading Institutes in Australia, England and Wales, Ireland, New Zealand, Scotland and South Africa to support and promote over 320,000 Chartered Accountants in more than 180 countries.

We also have a strategic alliance with the Association of Chartered Certified Accountants. The alliance represents 788,000 current and next generation professional accountants across 181 countries and is one of the largest accounting alliances in the world providing the full range of accounting qualifications to students and business.