Australian Government
Services Australia

Parliamentary Joint Committee on Law Enforcement

Inquiry into vaccine related fraud and security risks

Services Australia submission to part *b) Criminal activity around the supply of fake vaccines, black market vaccines and/or fake vaccine certifications and the acquisition of certificates.*

Privacy and security – Australian Immunisation Register (AIR) system

Services Australia (the Agency) takes the integrity of the Medicare system and the Australian Immunisation Register (AIR) extremely seriously.

Contemporary cybersecurity measures are in place across the Agency's AIR system to protect data and people's personal information. The Agency continues to invest in a cyber-skilled workforce, modern cyber technologies, advanced threat intelligence systems, next generation firewalls and industry best practice. As technology changes and new challenges emerge, the Agency routinely subjects its online systems to independent security testing, to ensure systems are kept secure and up to date to mitigate threats.

As an authorised Federal Government department, the Agency adheres to the *Privacy Act 1988* which relates to the collection, use and disclosure of personal and sensitive information to administer the *Australian Immunisation Register Act 2015* (AIR Act) and the relevant programme legislation. To appropriately manage the integrity and collection of personal data stored on the AIR system, the Agency ensures the system is only accessed by officers of the Agency and approved vaccination providers and their delegates with formal registration. The tightly managed level of access means record management and personal information stored in the AIR is secure and the integrity of records is maintained. In addition, the Agency uses the Provider Digital Access (PRODA) system to ensure secure access to government online services, including the AIR, via a user name, password and verification code log on.

Robust monitoring and fraud detection mechanisms are used to protect the security of people's Medicare details, including their COVID-19 digital certificates. Since the inception of the AIRAct , vaccination provider compliance has always been high. The Agency acknowledges with the emerging adult vaccine requirements there may be potential risk around forging of vaccination records, however to deter this activity there are harsh penalties in place. If a vaccination provider is not complying or has contravened obligations under the Act, they may face a civil penalty of 30 penalty units*. The AIR Act also contains penalties if there is an offence committed relating to protected information, which can be a penalty of imprisonment for 2 years or 120 penalty points, or both.

*Under Australian law, a penalty unit is an amount of money prescribed by the *Crimes Act 1914*, used as a basis to calculate monetary penalties and fines; a penalty unit is currently $222 for offences committed on or after 1 July 2020.

Proof of vaccination

The Agency is committed to ensuring all people have access to free and accessible vaccination certificates in Australia. The Agency is managing the balance of providing consistent security features, appearance and format for vaccination certificates across all channels, while also considering customer experience and accessibility. The Agency conveyed these points at the Senate Select Committee on COVID-19 hearing on 30 September 2021.

The Agency is aware of a small number of scams relating to vaccination certificates and allegations of fake certificates. The Agency works closely with the relevant authorities to address and manage those threats appropriately.

Australian Government

Services Australia

Digital channels

At the Senate Select Committee on COVID-19 hearing on 30 September 2021, Services Australia noted that it was working closely with the Australian Signals Directorate and the Australian Cyber Security Centre on managing vulnerabilities with the mobile applications used to generate and display digital certificates.

The COVID-19 digital certificate is designed to be quick and simple for people to access digitally when they need it. As the certificate is designed to be digital in nature, the Agency encourages people to keep it secure on their phone or computer and not to share it. The digital certificate is accessible via myGov through Medicare Online Accounts, and the Medicare Express Plus app. Individuals can also access the digital certificate through their My Health Record.

To access the digital certificate through the Medicare Online Account (through myGov), users need to have an established myGov account and have linked Medicare to this account. This linking requires the user to be able to answer a series of questions to establish the Medicare record they want to link to. Customers can call the Agency to receive a code to link their Medicare Online Account to their myGov account. This also requires the user to answer a series of questions or provide a verifiable identity document, such as a drivers licence. Once complete, they can access the certificate through this channel.

Once the Medicare Online Account is linked to myGov, the user will also be able to use the Medicare Express Plus app. The first time the customer uses the app it will ask them to provide their myGov credentials, including any two factor authentication process that was established. Once they have provided this information, users can set a four digit pin to use on future access to the app.

The certificate available in the Medicare Express Plus app contains a shimmering Coat of Arms that shifts position when tilting or moving the mobile device (a parallax effect). It also contains an animated tick, as well as a live clock showing the current date and times.

The Agency is aware of media reports concerning man-in-the-middle cyber attacks via the Medicare Express Plus app, however notes such attacks require significant knowledge and expertise. The Agency undergoes full cyber assessments several times a year and works closely with the Australian Signals Directorate and Australian Cyber Security Centre on potential vulnerabilities on mobile applications.

Individuals can add their COVID-19 digital certificates to the Apple or Google wallet directly from the Medicare Express Plus app. Individuals are presented with a privacy disclaimer notice when they click on the link to save it to their Apple Wallet or Google Pay. Individuals have a choice to Accept or Decline the terms; if declined, the individual is unable to save the certificate to the wallet.

The Agency continues to monitor the strength of security measures for proof of vaccination certificates, and will update as needed.

Paper certificates

Customers can also print their digital certificate, or request the Agency print and mail a copy of their digital certificate to them. If required, the Agency can arrange for customers to collect their proof of vaccination at their nearest Services Australia service centre.

The pdf certificate contains a Commonwealth Coat of Arms watermark, and every digital certificate displays a unique 'document number' which can be used to verify the authenticity of certificates in the future.

These features to safeguard against fraudulent activity are consistent with other official government documents, such as birth certificates and citizenship certificates.

Australian Government

Services Australia

Integration with state based check-in apps

The Agency is working in collaboration with state and territory health departments to integrate proof of COVID-19 vaccination into state and territory check-in apps. The Australian Cyber Security Centre has provided technical advice to the Agency on cyber security standards for integration with the AIR.

The integration solution uses public key infrastructure to communicate AIR data to the various state and territory apps, and includes the use of an Australian Government Information Security Manual (Australian Signals Directorate approved) cryptographic algorithm. Different levels of cybersecurity risk may remain for integration with state-based apps, depending on the ID verification capabilities of each individual state and territory app. The cybersecurity risk for state and territory apps is ultimately managed by each jurisdiction.

International COVID-19 Vaccination Certificate

Services Australia, in collaboration with the Department of Foreign Affairs and Trade, has created an International COVID-19 Vaccination Certificate for issue based on ePassport technology already in place across the globe. The International Vaccination Certificate aligns with the internationally recognised International Civil Aviation Organisation standards, using Visible Digital Seal technology. This will enable outbound and inbound international travel to and from countries that recognise this standard.

Australians will be able to access the International Vaccination Certificate through Medicare Online via myGov, the Medicare Express Plus app and as a pdf they can save or print. People's privacy will be protected through the consent-driven process. Their passport data will not be stored with their immunisation and health data.

Work continues on how best to support the data and security requirements to enable safe reopening of Australia's international border.