15 November 2019

Mr Andrew Wallace MP
Chair
House of Representatives Standing Committee on Social Policy and Legal Affairs
PO Box 6021
Canberra ACT 2600

Dear Mr Wallace

Re: Inquiry into age verification for online wagering and online pornography

The following letter serves as Australia Post's submission to the House of Representatives Standing Committee on Social Policy and Legal Affairs (the Committee) *Inquiry into age verification for online wagering and online pornography* (the Inquiry).

On 10 September 2019, following a referral from the Minister for Families and Social Services, Senator the Hon Anne Ruston and the Minister for Communications, Cyber Safety and the Arts, the Hon Paul Fletcher MP, the Committee began to conduct an inquiry into age verification for online wagering and online pornography.

Terms of Reference

The terms of reference for the Inquiry include consideration of online age verification and:

1. its potential as a mechanism for protecting minors online;
2. requirements of Commonwealth, state and territory government laws, policies and practices (including technical and privacy requirements) that relate to, and enable improved age verification requirements;
3. the potential benefits of further online age verification requirements, including to protect children from potential harm, and business and non-government organisations from reputation, operational and legal risks;
4. the potential risks and unintended consequences in further restricting age verification requirements, including, but not limited to:
   a. pushing adult consumers into unregulated/illegal environments or to other legal forms of these activities;
   b. privacy breaches;
   c. providing false assurance to parents and carers; and
   d. freedom of expression;
5. best practice age verification requirements internationally, including standards, verification and implementation timeframes, and particularly the likely effectiveness of the proposed age verification for access to online pornography in the United Kingdom's Digital Economy Act 2017;
6. barriers to achieving stronger age verification requirements, including but not limited to:
   a. capabilities of existing technology of business and verification providers;
   b. access, adequacy and security of third-party and government databases; and
   c. accurate and standardised capture of customer information;
7. education and warning messages associated with age verification;
8. the economic impact of placing further restrictions on age verification on business, including small business, and the potential financial and administrative burden of such changes;
9. the impact of placing further restrictions on age verification on other eSafety resourcing, education and messaging; and
10. Australia's international obligations.

This submission provides information for consideration by the Committee regarding Australia Post's history of providing identity verification services to Australian Governments and businesses, including a focus on our Digital iD™ product which provides a trusted and secure means of online age verification.

By focusing on Australia Post's Digital iD™ product, this submission outlines to the Committee information relevant to the Inquiry's terms of reference, including but not limited to 6(a) - *capability of existing technology of business and verification providers.*

Australia Post's history of Identity verification services

Australia Post has a long history of providing trusted services to communities, governments, businesses and individuals through our 208-year history. This includes providing identity services, including physical identity checks, for over 30 years through our network of over 4,000 Post Offices.

Each year, Australia Post conducts more than 8 million identity checks, including processing 1.9 million passport applications (94% of all passport applications) on behalf of the Federal Government and conducting more than 2 million employment checks for business, government and consumers.

In response to significant disruption in our traditional mail services, Australia Post has developed large scale digital capabilities and a new generation of eCommerce, identity and payment platforms to support all businesses and citizens in the digital age.

Australia Post's Digital iD™

Australia Post's Digital iD™ solution helps individuals prove who they are online when interacting with business and government and helps business and government verify the identity of those interacting with their services online. By using Digital iD™, individuals can also digitally assert that they are over 18 years of age.

With Digital iD™, Australia Post offers a secure digital alternative to prove an individual's identity and manage personal information, across channels and across Government and business services.

As an accredited Identity Provider under the Federal Government's Trusted Digital Identity Framework (TDIF), Australis Post's Digital iD™ follows the TDIF's Identity Proofing Guidelines. The level of assurance around an individual's claim that they are who they say there are (including their age) is dependent upon the level of evidence they provide to substantiate their claim.

By verifying a single, or multiple identity documents, such as drivers' licence or passport, an individual can create a reusable digital identity on their mobile device. Verification of documents alone can confirm the documents presented are valid, however it does not confirm the person presenting the documents is their rightful owner.

This level of assurance may be acceptable to gain access to some services or specific content, however the addition of a biometric match to document verification can be used to 'bind' the individual to the documents, thus providing a higher level of assurance.

Australia Post's Keypass in Digital iD™ provides this higher level of assurance and is a recognised proof of age identification for alcohol purchasing and licensed venues in Victoria, Tasmania, the ACT, Queensland and the Northern Territory (for venue entry only).

Creating a KeyPass in Digital iD™

To create a Keypass in Digital iD™, an individual must have a suitable smart phone (Android or Apple device) and two forms of government issued ID. The name, date of birth and identity document number are checked against an authoritative source, for example, via extracting the photo and details contained in a passport chip using near-field communication (NFC) technology or via the Federal Government's Document Verification Service (DVS).

The individual is then required to take a photo using their mobile device (a 'selfie') and perform a biometric 'liveness test'. This test confirms the person presenting is a real person and not a photo or a video. The individual's biometric template captured via the mobile device is also matched against the biometric template contained in the passport chip or verified face-to-face by a trained operator, at a participating Australia Post retail outlet. The Keypass in Digital iD™ entitlement is then securely stored within the Digital iD™ wallet on the individual's mobile device.

Using a Digital iD™ for proof of age online

A government agency, or a private business, can use Digital iD™ or an individual's Keypass in Digital iD™ online to verify an individual, including their age, for access to online services or information.

To prove their age, the individual could either scan a QR code or enter their mobile number into the relying party's website. A notification on their mobile device would then prompt the individual to consent to share required personal details with the relying party. For example, an individual may be requested to share their name and date of birth, or an 18+ status only (to confirm they are over 18 years of age).

Once the individual provides their consent to share their requested details, the relying party then receives the information from the Digital iD™ service (a "token").

The relying party specifies the information it requires to verify identity and/or age, however as the individual is always in control of their identity information, they can choose whether they share the requested information. By allowing the individual to control the information they share, an individual's privacy is protected and can in some circumstances allow anonymity. This also assists in restricting the sharing of personal information in circumstances where it may not be necessary to capture additional personal details other than those required to prove an individual's age.

Protecting personal information

When an individual creates a Digital iD™, a pair of digital security "keys" is generated. One key is stored on the individual's mobile device and the other by Australia Post's Digital iD™ platform. When a business or government agency that is a relying party requests verified details, the individual must first unlock their Digital iD™ app with a 6-digit security PIN or biometric authentication (such as Face ID or thumb print). The individual is them prompted to share the specific information requested by the relying party, by asking for the individual's consent to share the data.

By consenting to provide this data to a relying party, the individual provides their "key" (held in the Digital iD™ app) to then allow Australia Post's Digital iD™ platform to use its own key to unlock the individual's encrypted information so it can be provided to the relying party.

A key security feature of this encryption method is that no personally identifiable information can be accessed by Australia Post without both keys being activated, thereby protecting individuals' privacy.

Digital iD™ use today in the private sector

In addition to being accredited as an identity provider under the TDIF, and for use as an approved proof of age document in several states and territories in Australia, Digital iD™ is used by private businesses to verify individuals who wish to engage with their products and services online.

Current partners with Australia Post's Digital iD™ include CUA, Airtasker, Credit Union SA, Coinjar, SpacetoCo, The Room Xchange, and Vision Super.

Further information

The need for trusted and secure age and identity verification method for online interactions is increasing as the number of daily interactions increasingly move into the digital world. As more services and businesses transact and engage online, verification of individuals online will increase in importance. This forms the basis of the need and development of the TDIF.

Australia Post is proud to play a central role in providing trusted online identity solutions to business, government and individuals.

We welcome the Committee's consideration of the information contained in this submission.

For further information, please contact Australia Post's Head of Regulatory Affairs, David Jancik.

Yours sincerely,

Regis Bauchiere
General Manager, Identity Products and Services
Australia Post