

IIS is writing to support strongly the submission to the Senate Legal and Constitutional Affairs Committee Inquiry into the Identity Verification Services Bill 2023 and the Identity Verification Services (Consequential Amendments) Bill 2023 as lodged by the UTS Human Technology Institute.

IIS is one of the leading consulting firms in Australia that specialises in advising on privacy and cybersecurity. IIS was founded by a previous Privacy Commissioner of Australia. We have a global reputation for the quality of our advice, our thought leadership and the quality of our work.

While noting that the call for Submissions to your inquiry is closed, we would like to draw the Committee's attention to our perspective on the privacy protections in the exposure draft of the Digital ID Bill. We set these out in our response to the call for submissions by the Minister for Finance.

As noted in the UTS submission, the Digital ID Bill and the IVS Bill are closely interlinked. They need to be consistent with each other and potentially enacted in the right sequence. IIS agrees with the UTS recommendation that privacy protections in the Digital ID Bill should also apply in regard to the activities covered by the IVS Bill, preferably by incorporation of similar provisions.

However, IIS also notes a number of weaknesses in the protections provided in the Digital ID Bill. The most notable is the quite inappropriate breadth of circumstances in which national security and law enforcement can access information in the Digital ID system and the low bar for obtaining permission to do so. IIS would argue that protections in the IVS Bill should be at least as strong as in the Digital ID legislation including reflecting the considerations in our submission on the exposure draft of the Digital ID Bill.

We have placed a [copy of our submission](https://www.iispartners.com/privacy-regulation-reform) on the IIS website at:  
<https://www.iispartners.com/privacy-regulation-reform>.

We hope that our input is helpful. We would be pleased to expand on our thinking either informally or at a Committee hearing.

Regards

**Malcolm Crompton AM FAICD CIPP**  
Founder & Partner



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