



**Australian
Privacy
Foundation**

<http://www.privacy.org.au>

Secretary@privacy.org.au

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25 September 2016

Rachel Dixon
Head of Identity
Digital Transformation Office

Dear Rachel

Re: The Trusted Digital Identity Framework (TDIF) Project

Thank you for your note of 23 September.

We draw your attention to the points that we made on pp. 2-3 of our submission to you dated 23 August, relating to the lateness of your organisation's engagement with advocacy organisations on this matter.

We are of course primarily interested in consumer and citizen organisations, but as noted during your phone-call with Mr Vaile, industry participants who may have ideas or potential solutions to some of the problems, including those who made initial responses to the RFI, also seem somewhat under-utilised, as they have been asking us for whatever we knew of progress.

We also draw your attention to the points made on p. 6 of our submission, where we urged that:

- government policy must be respected, and a robust, multi-phase Privacy Impact Assessment (PIA) process commenced immediately, with key effort at the beginning, not the end;
- consultative processes must be placed on an appropriate footing, as an urgent matter. Such mechanisms are critical for providing well-informed, structured input, by advocates for the members of the public who are affected by the plan, into design thinking; and
- design considerations that have emerged during the Discovery and Alpha phases, prior to this critical feedback, must be regarded as remaining tentative, pending effective engagement and the reflection of the feedback in the architecture and design.

We note that:

- the TDIF project has been running for in excess of 15 months;
- the only progress in the last month has been a repeat of a 'suggestion' that a Round Table will be held in October, but without even a request to hold a particular date or date-range open; and
- a 'round table' with an Assistant Minister does not achieve compliance with your organisation's obligations under government policy to implement a full PIA process.

APF accordingly requests that you confirm that:

- 1) Your organisation is now complying with its obligations, and appropriate advocacy and consumer organisations are being involved in the PIA process; and
- 2) The development process has been suspended in order to enable the PIA process to catch up with it.

Or, alternatively:

- 3) In the absence of such assurances, would you please explain the basis on which civil society should regard the Round Table as anything more than a delaying tactic.

While we understand there is interest in this process at the political level, meetings of that nature are in no way a substitute for actual engagement in, and feedback into, the design.

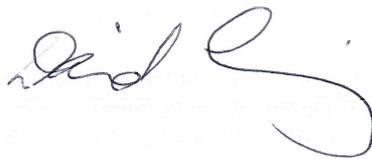
Only through a PIA process can the issues be clarified, discussed and resolved, the risks for all stakeholder categories assessed and managed, and the adequacy of mitigation measures and controls evaluated.

Thank you for your consideration of these urgent questions.

Yours sincerely



Kat Lane, Vice-Chair
0447 620 694
Kat.Lane@privacy.org.au



(Dr) David Lindsay, Vice-Chair
(03) 9905 5547
David.Lindsay@privacy.org.au



David Vaile, Vice-Chair
0414 731 249
David.Vaile@privacy.org.au