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Committee Secretary
Joint Select Committee on Gambling Reform
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23 February 2011

SUBMISSION TO THE PARLIAMENTARY JOINT SELECT COMMITTEE ON GAMBLING REFORM FROM THE BIOMETRICS INSTITUTE

1. Purpose of this Submission

This submission is made to assist the Joint Select Committee in its deliberations and in particular in response to the evidence of Regis Controls which was provided by representatives of that company on Wednesday 2 February 2011 (refer to the Transcript of the "Proof Committee Hansard", GR54 following, see <http://www.aph.gov.au/hansard/joint/commttee/J13538.pdf>).

2. About the Biometrics Institute

2.1 The Biometrics Institute is an independent not-for profit organisation established in October 2001. It is a forum for biometric users and other interested parties with a primary goal of facilitating the responsible use of biometrics. The Biometrics Institute's unique membership of key government organisations, police and security authorities, private sector vendors of product and services, banks and small and large business users of biometrics gives it an integrity and representativeness that enables the Institute to provide objective advice to the public and parliament.

2.2 The goals of the Biometrics Institute are as follows;

- To promote the responsible and ethical use of biometrics including due consideration to privacy concerns
- To provide a forum for discussion about biometrics between members, potential users and vendors
- To educate and inform members, business and the community
- To promote the development and awareness of standards, benchmarks and test regimes for the industry
- To provide policy input to governments in partnership with members and key stakeholders
- To encourage appropriate research and development of biometric technologies

2.3 Membership of the Biometrics Institute

The Biometrics Institute currently has 109 membership organisations and consists of both vendors and user organisations such as Qantas, banks, the Australian Federal Police, the Department of Foreign Affairs and Trade and many other state and federal governments. (See appendix A of this submission for full membership.) The governance of the Biometrics Institute is constitutionally weighted in favour of user organisations (see Biometrics Board membership in Appendix B).

The Biometrics Institute's commitment to privacy is highlighted by adoption of a special Privacy Code which was approved by the Privacy Commissioner and came into legal effect on September 1st 2006. This is the first such Code in the world and has drawn commendation from European and other international authorities.

In terms of technology, the Biometrics Institute is recognised as a world leader in lifting the standards and business processes related to biometrics. This is in tandem with the leadership provided by Australia in the adoption and development of biometrically enabled passports.

3. Privacy Issues

The Biometrics Institute has been monitoring very closely the concerns expressed in the media and elsewhere about the potential for privacy difficulties posed by the uncontrolled spread of biometric technology into areas such as clubs and hotels, schools and libraries. The use of biometrics technologies requires strong privacy controls and policies such as fit for purpose (that is, no use of biometrics for superficial purposes), full control of the data bases and information collected and a clear indication to customers as to how the biometric is collected, stored and used plus an opportunity for customers to give their informed, direct or implied consent whenever they allow their biometric to be collected or used. The Institute holds that an individual's identity and security is contained in his or her biometric and the use of that biometric is not to be taken lightly for superficial social purposes. Using biometric identifiers in Australian passports or in controlling access to computers is a different level of use from taking a fingerprint in a school library when borrowing a book or gaining access to a nightclub.

The Biometrics Institute has made frequent submissions to the Privacy Commissioner and to the media calling for a more rigorous privacy regime. In particular we have called for mandatory Privacy Impact Assessments and Audits before biometrics are introduced on any site, the ending of the current exemptions from the Privacy Act of employee records, small businesses, politicians and media and, most importantly, the creation of a single Privacy Act that integrates both the private and public sectors.

4. Technical Issues

The Biometrics Institute dedicates much of its resources to providing advice and testing for biometric technologies so that vendors and users understand the current state of the art in terms of biometric technologies and their fit for purpose. The Regis submission therefore needs to be examined in terms of their statements about the effectiveness of biometrics, in general, but also in terms of their application to gambling venues and the significant social issue of poker machines and other concerns of the Joint Select Committee.

The Biometrics Institute therefore wishes to clarify and/or contest the following statements made by representatives of Regis during their appearance before the Joint Select Committee on Wednesday 2 Feb 2011:

- 10% failure rate in biometrics in passports, refer GR55 second paragraph of the transcript:
Where is this statistic from and which passport does this refer to? Please also note that the Australian passport is using facial recognition, not fingerprints.
- 20-30% predicted failure rate, refer GR55 second paragraph of the transcript:
How do they derive this rate?
- 12% of the population do not have fingerprints, refer GR55 third paragraph:
Where does that information come from? Please also note that there are other biometrics such as sub-dermal fingerprinting or vascular options.
- Regis talk about a card as the answer but does the card not also need to be linked to a person?
Smartcards are open to being lent/ sold. How would they manage that problem?

We have also written to Regis asking them to clarify the information and the sources to us but are still awaiting their response.

At the outset, the Biometrics Institute reminds the Joint Committee about one of the basic precepts of effective identity management and security, that is, effective security and identity management is generally not achieved through a single technological solution but through a layering of technologies and procedures based on the assessment of risk. Factors such as people management, privacy concerns, training and end user acceptance are critical.

Yours sincerely,

Isabelle Moeller
General Manager
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Appendix A: Membership List

User Members (55) (55 main and 172 secondary contacts)

- ANZ Banking Group Limited
- Attorney-General's Department (AG) - D Branch
- Attorney-General's Department (AG) - Identity Security Branch Australia Post
- Australian Customs and Border Protection Service - CCTV & Enforcement Communications, Technology and Enforcement Capability Branch
- Australian Customs and Border Protection Service – Strategic Development (Passengers) Branch
- Australian Federal Police - ACT Policing
- Australian Federal Police (AFP) - Forensic Services
- Australian Federal Police (AFP) - High Tech Crime Operations (HTCO)
- Australian Taxation Office (ATO) - Brisbane
- Australian Taxation Office (ATO) - ICT Voice Services
- Australian Taxation Office (ATO) - IT Security
- Bank of New Zealand
- Bank of South Pacific Ltd.
- Brisbane Airport Corporation Ltd
- Centrelink
- CrimTrac Agency
- Defence Science & Technology Organisation (DSTO)
- Department of Corrections (NZ)
- Department of Defence - Chief Information Office Group
- Department of Defence - Investment Analysis Branch
- Department of Foreign Affairs & Trade (DFAT) – Australian Passport Office
- Department of Foreign Affairs & Trade (DFAT) – Diplomatic Security Services Branch
- Department of Human Services (DHS) - VIC Government
- Department of Immigration and Citizenship (DIAC) – Identity Branch
- Department of Infrastructure, Transport, Regional Development & Local Government - Office of Transport Security
- Department of Internal Affairs (DIA) (NZ) - Identity Services
- Department of Justice (VIC) - Corrections Victoria
- Department of Labour (DOL)
- Department of Prime Minister and Cabinet (PMC) - NSST Branch
- Department of the Attorney General and Corrective Services (WA) Information Services Division
- Department of Transport WA - Licensing Services
- Forensicare Inland
- Revenue Department, NZ
- Kiwibank
- Ministry of Social Development (MSD) - Integrity Services
- National Association of Testing Authorities (NATA)
- National Australia Bank Ltd (NAB)
- New Zealand Customs Service
- New Zealand Ministry of Defence - NZSIS
- NSW Department of Corrective Services (DCS) – Asset Management
- NSW Police Force - Anti Terrorism Security Group (ATSG)
- NSW Police Force - Forensic Services Group
- NSW Police Force - Operational Information Agency
- Privacy NSW (Office of NSW Privacy Commissioner)
- Qantas Airways Limited
- Queensland Department of Transport and Main Roads
- Queensland Police
- Roads & Traffic Authority (RTA)
- TAFE NSW - South Western Sydney Institute
- VIC Roads
- Victoria Police - Forensic Services Department
- Western Australia Police
- Westpac Banking Corporation

Supplier Members (47) (47 main and 69 secondary contacts)

- 3M ABnote Australasia Pty Ltd
- ARA Security Services (CWV) (AIC)
- Argus Global **
- Aulich & Co **
- Auraya Systems Pty Ltd
- Aware, Inc.
- Axeze Pty Ltd
- Backler Pty Ltd - Identity Matters
- Beacon Consulting (NZ)
- Biometix Pty Ltd **
- Biometric Consulting Group
- Cherry Australia Pty Ltd
- Cognitec Systems GmbH
- Daon
- Datacard Group Pty Ltd
- Evidence Technology
- Eyede NZ
- Fujitsu Australia Limited (formerly KAZ)
- Ganetec Global Solutions
- Gemalto Pty Ltd

- Gen-i Australasia Pty Limited
- Geoff Poulton Research
- Giesecke & Devrient Australasia P/L (G&DAus)
- Hagemeyer Photographics
- Hewlett-Packard South Pacific
- Hitachi Australia Pty Ltd
- Identity One (formerly Biometric Innovations Pty Ltd) **
- InTec1 Pty Ltd
- Jebel Consultant Group
- Mondami Pty Ltd
- Morpho Australasia (formerly Sagem)
- NEC
- OmniPerception Ltd
- PeopleKey
- Raytheon
- Rofin Australia Pty Ltd
- Salmat
- Secom Australia Pty Ltd
- Secure World (International) Technologies Ltd
- Shanahan Tudhope Lawyers
- Siemens IT Solutions and Services
- The Personnel Risk Management Group Pty Ltd (PRM Biometrics)
- Unilink Software
- Unisys
- Valid8 Technologies Pty Ltd
- Wacom Australia Pty Ltd

Universities & Research Institution Subscribers (8) (8 main and 10 secondary contacts)

- Canberra Institute of Technology (CIT)
- Queensland University of Technology (QUT) - Faculty of Built Environment and Engineering
- RMIT University - School of Computer Science & Information Technology
- RMIT University - School of Electrical and Computer Engineering
- RMIT University - School of Mathematical and Geospatial Sciences (SMGS)
- University of Canberra - Faculty of Information Sciences and Engineering
- University of Southern Queensland (USQ) - Division of ICT Services
- University of Technology Sydney (UTS) - Centre for Forensic Science

As at: 21/02/2011

Total Number of Membership Organisations: 109

** Organisations marked with two stars have signed the "Biometrics Institute Privacy Code Agreement to Comply" and are therefore Biometrics Institute Privacy Code Subscribers. Refer to <http://www.biometricsinstitute.org/displaycommon.cfm?an=1&subarticlenbr=8> for details.

Appendix B: Board Composition



Paul Kirkbide BSc, BSc(Hons), PhD, Chairman and Director, Biometrics Institute

Paul is also the Chief Scientist, Forensic and Data Centres, Australian Federal Police (AFP) - Forensic Services. He was appointed to the Board on the 17 March 2008 to fill a vacant position. He was re-elected to the Board and at the AGM on the 31 October 2008 and appointed Chairman.



Caroline Hubbard, Director, Biometrics Institute

Caroline is also the Strategic Development Manager ID Services, Department of Internal Affairs New Zealand. She was elected to the Board at the AGM on the 31 October 2008.



Terry Hartmann BSc, Director, Biometrics Institute

Terry is also the Vice President, Security Solutions & Identity, Unisys. Terry was the IT Manager, Passports, Dept. of Foreign Affairs and Trade until September 2004 when he joined Unisys. He was appointed to the Board on the 23 Oct 2003, re-elected at the AGM on the 16 Nov 2007 and most recently re-elected at the AGM on the 6 November 2009.



Arron Baker, Director, Biometrics Institute

Arron is also the Programme Manager, Identity & Biometrics, Client Profiling, Immigration New Zealand, Department of Labour. Arron was appointed to the Board on the 6 August 2009 to fill a vacant position. He was officially elected to the Board at the AGM on the 6 November 2009.



Karen Shirley, Director, Biometrics Institute

Karen is also the Team Leader Future Technologies, High Tech Crime Centre at the Australian Federal Police. She was elected to the Board at the AGM on the 6 November 2009.



Leanne Stevenson, Director, Biometrics Institute

Leanne is also the Manager Identity Services, Australia Post. She was elected to the Board at the AGM on the 6 November 2009.



Kevin Darch, Director, Biometrics Institute

Kevin is also the Senior Sergeant, Visual Identification, Forensic Services Branch at the Queensland Police. He was elected to the Board at the AGM on the 31 October 2008.



Cyril Dujardin, Director, Biometrics Institute

Cyril is the Managing Director, Morpho Australasia. Cyril was appointed to the Board on the 17 December 2009 to fill a vacant position.