

Driver's licence card number roll-out

SUMMARY

A seemingly simple one-field change - the addition of a card number to drivers licence - took multiple years to roll-out. Our business customers who previously had a single, Australia wide approach had to adopt processes to recognise state-based data nuances and then differing and delayed start dates through 2022.

The impact to the market of this change was an initial drop in driver's licence match rates of around 15% due to the additional data field, which flowed through to reduced verification rates for customers.

BACKGROUND

Driver's licences have both a licence number that typically stays with the identity of the driver, as well as a card number that relates to the document. When the DVS started in 2014, driver's licence DVS search was limited to the name, date of birth and driver's licence number.

Unfortunately, in September 2020, Transport for NSW suffered a data breach and approximately 54,000 licences were left exposed in an open cloud storage.

To prevent the use of potentially stolen licences, the DVS planned to update the driver's licence search to name, data of birth, driver's licence number AND card number.

IMPACT

From the states and territories, this required:

- Getting all state-based driver's licences to make card number available for DVS searching;
- Updating each state-based DVS driver's licence search to include card number;

For businesses using the DVS, this required for each of our 600 business customers

- Add to their institutions online forms, state-relevant instructions about card number; and
- Update their requests to include card number; but this had to be in synch with differing state-based roll out (see below)

The vast majority of these businesses have customers around Australia and faced the complication of tailoring processes, like application forms, to differing state formats for drivers licence (states had their own specific location for the new card number). All of this was happening on different dates.

This required more complex validation logic and website design for each of these 600 customers and as a Gateway Service Provider, extensive communication, engagement and collaboration with each business

Initially, (November 2020) the DVS (then under Home Affairs) communicated a December 2021 go-live for all states. However, reflecting both feedback from industry and the states saw the timeframe pushed out, with 2022 then becoming the year of differing start dates and delays.

February 2022

- NSW was the only state with confirmed go-live of 1 July 2022
- Tasmania uploaded all card numbers but did not have a go-live date
- ACT, SA & WA uploaded part of their card numbers but did not have a go-live date
- NT, QLD & VIC did not have card numbers ready

March 2022

- ACT & SA uploaded all their cards with a go-live of 1 September 2022

April 2022

- NSW go-live date delayed from 1 July
- NSW, ACT, SA & TAS uploaded all their cards, go-live of 1 September 2022

May 2022

- QLD & VIC still had no cards uploaded and go-live was foreshadowed for 2023
- All other states uploaded their cards and had a go-live of 1 September 2022

September 2022

- NSW, ACT, SA, TAS, NT & WA live on 1 September 2022

October 2022

- QLD uploaded all their cards and with a go-live date of 1 November 2022 - but with a week to go, the go-live was delayed from 1 November to 7 November

November 2022

- VIC uploaded only the cards impacted by Optus breach and a go-live of 19 December 2022

Consent fatigue

As part of presenting their identity information before accessing services, consumers are faced with an increasing number of consent clauses that they need to read, acknowledge and accept.

For example, when applying for a financial product, a consumer may be faced with the following:

1. An informed and express consent request for DVS, such as the following example
I confirm that I am authorised to provide the personal details presented and I consent to my information being checked with the document issuer or official record holder via third party systems and services for the purpose of confirming my identity.
2. Another specific informed and express consent for accessing their credit reporting information for use to meet AML/CTF provisions
3. Any other consent request for the use of a consumer's data for other purposes

The Identity Verification Services Bill proposes FVS express consent in addition to the above and with more extensive description

While we support and believe express consent is best practice, consideration must be given to the consumer experience so as to not overwhelm them with information and/or legalese, potentially undermining the intended outcome - an informed consumer.

Equifax supports standardising express consent as much as possible instead of having different consent rules per verification source, preferably aligning them under the Privacy Act reforms.