Submission to the Access Card - Inquiry into Human Services (Enhanced Service Delivery) Bill 2007.

This submission relates to "the information to be included in the card register and card's chip and on the card's surface".

I submit that a photograph on the proposed Access card is a serious threat to our future privacy. If a strong identifier is required I argue that it should not be one that can be taken without the individual consenting to be identified.

It is proposed that the Access card will bare a photograph of the holder. The Access card registration process will therefore require that a photograph be taken and stored in a database.

Although seemingly harmless a database of photographs is a real threat to our privacy. An individual can be photographed without even being aware and indeed most of us already have our images captured by security cameras several times a day. Evolving facial recognition technology (such as that used by DFAT trials at Sydney airport) could potentially be used to match images from security cameras (or other sources) with a database of digital images such as that which the Access card registration process will generate.

With the next generation of facial recognition technology the creation of this database will enable the face of a person to become a virtual number plate – allowing individuals to be identified even when they have not consented.

If a strong identifier on the Access card is required alternatives that require the individual's consent before an identification can be made should be considered. These alternatives would include finger printing, retina scans, hand vein mapping and many others.

Before billions of dollars are put into issuing the Access card the Australian people should be presented with a compelling business case that lists the benefits to be produced and analyses a number of options for how those benefits might be realized. If this analysis were performed we might find better options but even if the Access card is demonstrably worth the cost I submit that it not be issued with a photograph.

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