

**SENATE FINANCE AND
PUBLIC ADMINISTRATION COMMITTEE
SUBMISSION – HUMAN SERVICES
(ENHANCED SERVICE DELIVERY) BILL 2007**

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Introduction

The Human Services (Enhanced Service Delivery) Bill 2007 was introduced into the federal parliament during February 2007 with conflicting aims – either as an access card services or as a facilitator to welfare and like services.

In promoting this program prior to the bill being introduced into parliament, federal ministers have claimed simultaneously that the program will “provide access to government services” and that the card “will provide access to welfare and Medicare monies”. Given that the second quote is a subset of the first, clarification is required on the true intent of the program given that at least one state government minister is on record advocating the integration of state programs into the federal one and the content of federal ministers commentary.

The risks associated with this type of program are immense. Ranging from technical to operational, security and access rights, privacy and the ability for data mining and nefarious activities (including creating false records and making people “disappear”) coupled with function creep across federal and state governmental agencies, clear communication is required to allow the community to be fully informed about the true intent of the program.

Those who advocate the position “if you have nothing to hide, do not worry” have been either hoodwinked or are truly unconcerned about their most private and intimate (whether financial, medical or other records) details being available for potential misuse.

From a technical standpoint, such a program is fraught with problems. In Queensland and NSW, access card programs for public transport systems have been repeatedly delayed due to technical issues – NSW since 2000 and Queensland since 2004. Internationally, the United Kingdom developed a similar proposal during the early years of this decade, only for it to become an identity card program after the July 2005 terror attacks in London. Given that the federal program is the biggest ever, having a clear framework of the intent and scope of the program is essential for its success.

Put simply – the scope and intent of the program seems to be a rehashing of the Australia Card program during 1984-86, given the public record of ministers on the matter.

Issues of Concern

I have grave and substantial concerns on the implementation, access and security of the Access Card as it now stands. During the “debate” concerning this program, there has been little credible information from governmental sources about all aspects of this program ranging from privacy, technical, program scope, integration with other program at federal and state levels, legislative and security. With regular reports of misplaced and stolen information from governmental and private repositories, these issues must be addressed in an open, transparent and inclusive manner *prior to any wide scale deployment* of any “Access Card” regime. The conduct of government ministers has been the opposite since the inception of this program.

In addition to the concerns listed below, there is the possibility of function creep to state government agencies. Paul Lucas (Queensland minister for Transport and Main Roads) is on record advocating the integration of the Smart Licence program into the Access Card program. In addition, the NSW Roads and Transit Authority (RTA) is developing a photo identification scheme that replicates the federal program almost in its entirety. The resolution of the integration between state and federal agencies must be resolved *prior to commencement of the program* to ensure confidence by the community.

The concerns include:

1. Accountability measures for departmental staff;
2. The role of the program – several government ministers have used the phrases “access to government services” and “Medicare and welfare payments” interchangeably ever since the program was announced;
3. The role of previous programs like the HealthConnect and Document Verification Service within this program;
4. Security of registry – any electronic registry is at risk of compromise from internal and external threats. This risk is enhanced when many other registries and databases are linked together with a single index counter, allowing deep data mining and the potential for departmental employees (or hackers) to remove entries and make people “disappear” or to create fake entries that allow people to change identities;
5. Linkages with Births Deaths and Marriages – No commentary has been undertaken on any linkages with the Births Deaths and Marriages offices in each state. If the purpose of this card is to reduce fraud, then resolution of this issue is paramount;
6. 100-point identity check – As with the previous point, no commentary has been undertaken on what (if anything) will replace the various governmental cards that the Access Card is replacing for this program. As many people rely on these cards when proving identity when opening bank accounts and the like, what role will the Access card play in this program (unless it is a Australia Card by stealth)?
7. Third party access – There has been minimal discussion about third party access to the registry. What access will financial institutions and other private firms have to the registry? What about law enforcement and other government agencies? Immediate clarification is required to ensure that proper and effective protocols are implemented *prior to* the commencement of the program to ensure accountability and transparency;
8. Personal Access – The previous Human Services minister went on record promoting the benefits of the program when dealing with agencies over the telephone or internet. Will the registry capture voice recordings and IP addresses of each person who has a card? Will the government fund the rollout of card readers to each household so that the card can be swiped to ensure that the person is really who they say they are?
9. Access Card – The level of information that will be displayed on the card face is concerning. If it was purely an access card to welfare and like governmental services – the need for the place and date of birth, photo and serial number is redundant. The only conclusion the author can deduce from the amount of information on the card is it is an identity card by stealth.

Conclusion

In closing, the discussion surrounding the Access Card program has been focused on access to federal government services, limited to medical and welfare payments. The subtext of discussion from government ministers indicates that the limitation will be lifted at an unspecified time in the future.

The overall discussion to date has been hampered by the lack of information from government concerning the actual intent and scope of the program, the total lack of concern over privacy and integration issues across multiple government agencies and a disregard on technical and accountability issues. Clear, concise and transparent information is required on these – and other – issues *prior to any further action* on the issue to ensure that the community is satisfied that the card will not be a identity card by stealth. It is interesting to note that the expressed intent of the current program mirrors exactly the Australia Card proposal during 1984-86 and the leading political participants have swapped sides during the intervening time period.

Put simply, the current proposal reflects the Australia Card proposal and is more intrusive, allowing for corruption and the inversion of the democratic accountability process – that the public is beholden to the public service rather the public service beholden to the public.

Reference List

NSW Roads and Traffic Authority Photo ID Card Project

URL: <http://www.rta.nsw.gov.au/licensing/photocard.html>

Queensland Transport, Translink Smart Card Project

URL: <http://www.translink.com.au/qt/translin.nsf/index/smartcard#available>

Queensland Transport, Driver Licence Project

URL:

http://www.transport.qld.gov.au/Home/Projects_and_initiatives/Community_consultation/New_Queensland_driver_licence/

United Kingdom Home Office, Identity Card Project

URL: <http://www.identitycards.gov.uk/>

URL: <http://www.commonleader.gov.uk/output/page965.asp>