



Austroads

Austroads Incorporated
Registration and Licensing Program
Program Manager – David Stuart-Watt
PO Box K198
HAYMARKET NSW 1240
☎ (02)9218 6998 ☒ (02)9218 6778
Email: david_stuart-watt@rta.nsw.gov.au

RLTF 38/07
27 February 2007

Committee Secretary
Senate Finance and Public Administration Committee
Department of the Senate
PO Box 6100
Parliament House
CANBERRA ACT 2600

Dear Secretary

Access Card – Inquiry into Human Services (Enhanced Service Delivery) Bill 2007

Thank you for the opportunity to comment on the *Human Services (Enhanced Service Delivery) Bill 2007*, which will support the introduction of the new Health and Social Services Access Card (the Access Card).

Austroads, as the association of Australian and New Zealand road transport and traffic authorities, aims to improve road and road transport outcomes. Austroads, via its Registration and Licensing Task Force, assists road and transport agencies in their efforts to improve the security and integrity of driver licensing and vehicle registration systems and achieve national consistency in the delivery of registration and licensing services and the exchange of information.

The work of the Task Force is undertaken in the context of an increasing importance in the security and integrity of information contained in registration and licensing data. The use of smartcard technology for the purposes of providing more secure driver licensing systems is under active consideration by the Task Force. While the Queensland Government is the only jurisdiction proposing at this time to upgrade its current driver licence to a smartcard, all other Australian jurisdictions have acknowledged the importance of continued mutual recognition and interoperability of driver licences.

States and Territories have agreed to work together under the auspices of the Task Force to progress the development of common standards and specifications for interoperability of smartcard driver licences, with a view to developing an intergovernmental agreement known as the Smartcard Licence Interoperability Protocol (SLIP). Development of SLIP was endorsed by Commonwealth, State and Territory Transport Ministers at the Australian Transport Council in June 2006.

Queensland Transport has, in leading the development of the SLIP, engaged with the Commonwealth Government's Office of Access Card with the aim of identifying opportunities for interoperability and liaising on implementation issues common to the Access Card and smartcard driver licences. This engagement has identified a range of common interests in the development of the Access Card and a smartcard driver licence, and in particular highlighted priorities in relation to:

- the mutual role of these products as Evidence of Identity (EOI) where voluntarily presented by the card holder;
- the role of the Access Card in providing proof of eligibility for concessions for registration and licence products issued by State and Territory agencies;
- a limited degree of interoperability between the smartcard systems, to provide the capacity to verify (from the chip itself) that a credential presented is genuine and un-tampered; and
- the capacity to read certain (very limited) information from the smartcard that another agency is authorised to access.

At present, both the Access Card and the SLIP program plan to utilise ISO-based technical standards that will be compatible with the Australian Government Smartcard Framework. An independent Privacy Impact Assessment will be undertaken prior to the endorsement of the SLIP by Transport Ministers.

The Registration and Licensing Task Force acknowledges the primary purpose of the Access Card as the vehicle for efficient and secure delivery of a range of benefits provided via the programs of various participating Commonwealth Government agencies. The Access Card will replace a number of cards that are currently used by registration and licensing authorities as acceptable sources of EOI and as proof of eligibility for access to certain concessions. The Task Force is therefore pleased that the Bill appears to support the existing business relationships between the Commonwealth and State and Territory jurisdictions in respect to EOI and registration and driver licensing concessions.

The Task Force has noted that State and Territory agencies will retain discretion regarding the use of the Access Card to fulfil evidentiary requirements under certain conditions provided for in the Bill. Registration and licensing authorities welcome access to what is understood will become – at the choice of the card holder - a high integrity, Gold Standard form of EOI. However, a key point of difference has been created under clauses 45 and 46 of the Bill which distinguish between requesting and requiring the Access Card as EOI or to establish eligibility for concession programs.

It is noted that State and Territory agencies will retain the ability under these provisions to request the Access Card as one form of accepted EOI for the purposes of issuing a registration and /or driver licence concession. However, to require the card for any other purpose will constitute an offence. The Taskforce understands and supports the policy intent behind this initiative as it avoids the Access Card being used or perceived as a national identity card.

It is also noted that State and Territory agencies will be able to request the production of the Access Card as proof of eligibility for a registration and/or driver licensing concession. However, State and Territory agencies will need to examine their client enrolment practices for the delivery of registration and licensing products beyond the administration of relevant concession programs, to ensure compatibility and compliance with the intent of the Commonwealth legislation.

The parallel development of the Access Card and the Queensland Government's smartcard driver licence (in the first instance) offers opportunities for developing robust systems that provide for the secure access to very limited information stored on the smartcard chip. Discussions between the Office of Access Card and Queensland Transport have identified this limited level of interoperability as a core business requirement for the integrity of both systems, particularly to:

- verify a card is genuine, current and un-tampered; and
- access information stored on the chip (such as the legal name, date of birth, and current pensioner concession number and/or status) under defined circumstances and with the appropriate customer consents.

If road transport agencies are to be able to accept, when presented voluntarily, the Access Card as EOI for enrolment for a driver licence, they will need to be able to access information (such as legal name, pensioner concession number and/or status) from the smartcard chip, as this will not always be available from the printed card face. Inability to confirm legal name from the Access Card chip is likely to preclude its use by the customer as a high integrity EOI document when enrolling for a driver licence. Similarly, the

inability to access and verify pensioner concession number and status will present difficulties for both road agencies and customer in relation to driver licence and vehicle registration concessions.

The Task Force notes that the Bill, while silent on this matter, does not appear to preclude this level of interoperability. Rather the Bill appears only to require State and Territory agencies under clause 57, to establish robust processes for acquiring written informed consent for accessing and recording information contained on the card - including from its smart chip, though this could be made clearer in the Bill so as to avoid doubt.

At this stage, it would appear that the only two methods available to road transport agencies to confirm basic card holder information (such as legal name or customer benefit reference number) appear to be:

- (a) via real time on-line access to the proposed national Document Verification Service, or similar system;
- (b) by the installation of card readers and supporting infrastructure at customer service centres within the individual state and territory road transport agencies.

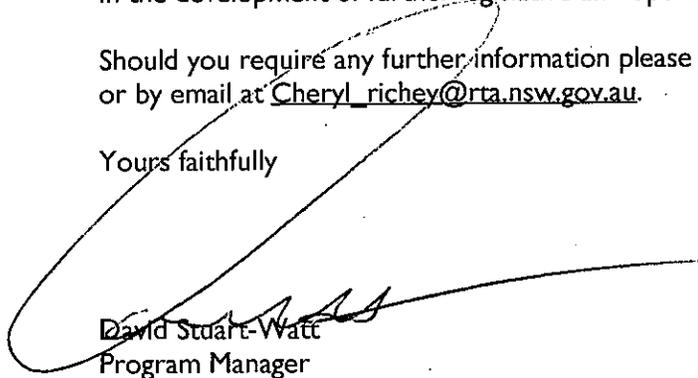
The planned rollout date for the Access Card (early 2008) will be significantly in advance of the planned infrastructure rollout within Queensland for the New Queensland Driver Licence. No other State or Territory Government has yet announced plans to install this infrastructure within their own service delivery networks.

If the Access Card is to be used (at the election of the customer) for EOI purposes when enrolling for a driver licence, the Office of the Access Card and road transport agencies will need to consider interim strategies to enable basic information to be accessed from the smartcard chip. The Task Force therefore strongly recommends further discussions between the Commonwealth Government and State and Territory agencies that would use the Access Card for EOI and proof of concession eligibility purposes to develop these transitional strategies as a matter of priority.

The current Bill is understood to represent the first component of the legislative reform proposed to support the introduction of the new Access Card. The Task Force looks forward to ongoing involvement in the development of further legislative and operational arrangements in support of the Access Card.

Should you require any further information please contact Ms Cheryl Richey, on telephone (02) 92186245 or by email at Cheryl_richey@rta.nsw.gov.au.

Yours faithfully



David Stuart-Watt
Program Manager
Registration and Licensing