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Service Victoria Bill 2017

1. The Service Victoria Bill 2017 aims to provide a legislative framework for a single online point of contact with Victorian instrumentalities and departments. The software and hardware have already been created and tested. The government claims that the system can be turned on using existing authorities, but with clearer permissions and sanctions against misuse.
2. At the outset, Liberty Victoria acknowledges and is thankful for the extensive consultation provided by Service Victoria. This was truly exceptional in an era where often there is very little time for stakeholders to engage and respond to proposed legislation.
3. However, Liberty Victoria remains deeply concerned at creating a 'honeypot' of identifying and tracking information that lies at the heart of any such information system – however well-constructed.

Purpose

4. The Government has sought to address the concerns of the Auditor General in 'Delivering Services to Citizens and Consumers via Devices of Personal Choice: Phase 2' (Oct 2015), and also the concerns of tech savvy consumers who are desiring of a single click satisfaction of their licensing/taxing/regulatory needs.
5. The portal that has been created does meet many privacy standards. The entry point stores minimal information – once the identity (ID) has been established only a token certifying that level of ID is kept on the website. The department or instrumentality being accessed is told that the ID is correct and doesn't require re proof for later access, nor do they store ID information. Only those departments or instrumentalities that the consumer wishes to access are linked to their account. The government is keen to encourage all departments to destroy all ID records (copies of drivers licences/passports etc) used for past proof of ID, which are now not required if the consumer has moved to the new website.
6. This meets a key privacy requirement to minimise record storage and destroy any identifiers which are no longer needed.
7. The website will offer three levels of permanence: (1) guest – where any ID requirement will have to be met for each new guest entry (similar to the current arrangements of proof for each counter visit); or (2) a person can ask to keep an online ID and then remove it after he or she has completed a set of transactions; or (3) a person can keep an ongoing permanent ID which is capable of being terminated at any time at the person's request.
8. According to a survey undertaken in 2016 there are at least 62 different requests for ID asked for by arms of the Victorian Government. Those requests vary in what is asked and how many redundant items are needed. The aim of the new system will be to simplify to four levels of ID, from the very simple /low level for fishing licences to the very strict for liquor licences and driver licences. The website account can be proved to any of those four levels and becomes automatic proof for the level met and any lower level of ID.

9. Entry to the site will be by account name and password, with security flags raised if new devices are used, or new IP locations are used, for the log on.

Security Concerns

10. The Government is very keen to promote this as a one size fits all access. Yet non tech-savvy individuals will be making all their data available in one place. Without a VPN (virtual private network) attached to their personal device (mobile phone/laptop/desktop), access via WiFi will potentially open the whole of that person's private records to third parties. The use of public access WiFi (coffee shops, airports etc) allows interception of account names and passwords. Banks and similar institutions of trust are moving to app-based rolling PINs and other similar security methods for transactions of this level of privacy in an attempt to overcome the problems of insecure access routes.
11. The 'honeypot' is made bigger, and more attractive to potential hackers, because it will constitute the online point of access for the two or three Departments which most require casual contact (VicRoads, Consumer Affairs, Agriculture), and further it ultimately aims to have all details of all contact between the State and the individual.
12. The question should be raised as to why smaller departments with diverse ranges of interaction need to conform to the Service Victoria template, when nearly all savings and efficiency reside with the high-volume transactions in a few departments.
13. Any questions with regard to this comment can be directed to Liberty Victoria President Jessie Taylor, Policy Committee Member Tim Warner, or the Liberty Victoria office on 9670 6422 or info@libertyvictoria.org.au.

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