Australian Government
Office of the Australian Information Commissioner

Identity Verification Services (IVS) Assessment of the Attorney-General's Department

Summary

The Office of the Australian Information Commissioner (OAIC) assessed the Attorney-General's Department (the Department) as administrator of the identity verification facilities. We focused on the Department's management of the Face Verification Service (FVS), which is one of the 3 approved identity verification facilities. We assessed whether the Department was managing the FVS in line with the privacy requirements of the IVS Act and the Privacy Act. We also looked at the Department's privacy capability, participation agreements and the completed privacy impact assessments relating to aspects of the IVS system.

Our findings

We found the Department was managing the FVS in accordance with privacy requirements, with 2 limited exceptions. The first was some governance documents (such as IVS-specific policy and privacy statement) did not contain up-to-date information about aspects of the IVS. The second was the Department's agreements with participants did not clearly include 2 IVS Act requirements (regarding destroying facial images and limiting the use of identification information by a government authority).

Our thorough review of the only agreement in place as at 30 June 2024 between FVS participants—the Department, the Australian Taxation Office and the Department of Foreign Affairs and Trade—also identified opportunities:

- for the identification of privacy risks and mapping of information flows across the FVS and its participants
- for the Department to proactively monitor recommendations from privacy impact assessments conducted for the purpose of making FVS requests.

Recommendations

We recommended that the Department continue to update the regularly review and update its privacy practices, procedures and systems. We also recommended that before they enter any further FVS participation agreements, they amend the participation agreement template to include the requirements in the IVS Act.

We made 3 further suggestions aimed at enhancing the Department's practices in relation to privacy impact assessments conducted for the FVS.

Takeaways

It's important for entities that work collaboratively on projects or systems to map information flows from end-to-end, rather than in isolation. This ensures they have a holistic understanding of the privacy risks involved.

OAIC