

Jan Cumming, Senior Associate
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Via email to: jcumming@claytonutz.com

2nd March 2014

Dear Jan,

Re: Proposals to Enhance the Document Verification Service (DVS)

EFA welcomes the fact that a PIA is being performed on these proposals, and appreciates the opportunity to provide input, both in person and via this submission.

EFA understands that significant gains in terms of efficiency can potentially be achieved through the use of a service such as the DVS, and that these benefits will potentially flow to both organisations using the service and to individuals whose documents are being verified. EFA also understands that there are potential privacy gains available from a document verification service, where the use of such a service reduces the need for organisations to receive and store copies of identity documents.

1. Expanded commercial access

EFA is generally concerned that any further expansion of the DVS into the commercial sector will increase the potential for misuse of the service, particularly if such expanded access is combined with full field-specific matching.

That said, EFA does believe that the Principles for Access set out in the consultation paper are an appropriate set of minimum requirements that commercial organisations must meet before access is considered.

EFA does not believe that there are a significant number of commercial organisations outside those industries that are already able to access the DVS - ie within the financial and telecommunications sectors - that would be able to satisfy the Principles for Access, particularly in relation to point 2: *have a demonstrable requirement under law to verify the identity of their clients*. It would therefore be beneficial for some examples to be included within the PIA report of the types of commercial organisations that have requested access to the DVS.

2. Expanded functionality (field specific matching)

EFA understands that the current binary response is not ideal and leads to significant false negatives that undermine the effectiveness and efficiency of the service.

EFA is however concerned that the introduction of full field-specific matching would create scope for misuse of the service, such that a user could perform a series of queries that would potentially allow the user to extract information from the system well beyond the scope of simply confirming an individual's identity. As noted above, EFA would be particularly concerned about the scope for misuse if both full field-specific matching and expanded access to the DVS for commercial organisations are adopted.

EFA believes that modifying the responses provided by the service to include a response which indicates a 'partial match', without providing any further information, would be a very significant improvement to the service, while avoiding the potential for misuse that full field-specific matching would provide. EFA therefore recommends that this option be actively considered before any decision is made in this regard.

Please let me know if you require any further information.

Yours sincerely,



Jon Lawrence
Executive Officer